

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

LIANA DAVIS,

Plaintiff,

V.

CHRISTOPHER COOPRIDER, AID
ACCESS GMBH & REBECCA GOMPERS,

Defendants.

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CIVIL ACTION NO. 2:25-CV-220

**DEFENDANT CHRISTOPHER COOPRIDER'S RESPONSE TO
NON-PARTY AMY AMOROSO'S MOTION TO QUASH SUBPOENA**

Defendant Christopher Cooprider files this Response to Non-Party Amy Amoroso's Motion to Quash Subpoena [Dkt. 110], and in support thereof, will respectfully show the following:

I. SUMMARY

Mr. Cooprider and his counsel are sympathetic to Ms. Amoroso's scheduling concerns related to her fiancé's injury and medical care, her child-care responsibilities, recent wedding, and part-time job; and, of course, are willing to help mitigate those concerns through reasonable accommodations as to the timing, location, and format of her subpoenaed deposition. However, despite the protestations otherwise by Ms. Amoroso and Ms. Davis contained in the motion to quash, Mr. Cooprider has good reason to believe that Ms. Amoroso may indeed possess relevant information discoverable and important to this case. In the days just prior to the events of April 5-6, 2025 in which Ms. Davis alleges that Mr. Cooprider intentionally poisoned her to cause a miscarriage, Ms. Davis texted Mr. Cooprider saying that she was cramping, scared of miscarrying in public, was concerned about being on her feet in the heat for 4 hours at a carnival, and crucially

that her “sister thinks I need to take the kids and go to the ER” and that her sister said her kids would “much prefer a baby bro/sis over a carnival. Priorities.” These messages alone suggest that Ms. Davis’s sister, Ms. Amoroso, had some level of knowledge of Ms. Davis’s pregnancy in April 2025, as well as concerns that she may have been miscarrying—prior to the events of April 5-6, 2025. Mr. Coopridier is entitled to explore Ms. Amoroso’s memory and any available records related to Ms. Amoroso’s salient conversations, text messages, etc. with her sister Ms. Davis regarding these topics. Further, to the extent Ms. Amoroso claims that she has consciously deleted previous text messages with Ms. Davis—Mr. Coopridier is entitled to explore when and why such messages may have been deleted. Finally, and notably, Ms. Amoroso was initially willing and cooperative to provide her deposition testimony when communicating with Mr. Coopridier’s attorneys in response to the subpoena, prior to the instant motion being filed on her behalf by Ms. Davis’s attorney—belying the current claims of extreme/undue burden.

II. ARGUMENTS AND AUTHORITIES

The motion to quash is, understandably as will be seen, bereft of on any legal authorities beyond a fleeting reference to Federal Rule of Civil Procedure 45(d)(3)(A)(iv), arguing that Coopridier’s deposition subpoena to Ms. Amoroso subjects her to an “undue burden.” Notably, under key Fifth Circuit precedent, the moving party has the burden of proof to “demonstrate that compliance with the subpoena would be unreasonable and oppressive,” and whether a burden is undue “must be determined according to the facts of the case, such as the party’s need for the [information] and the nature and importance of the litigation.” *Wiwa v. Royal Dutch Petroleum Co.*, 392 F.3d 812, 818 (5th Cir. 2004). Additionally, complete quashing of a subpoena is disfavored, and “modification of a subpoena is preferable to quashing it outright.” *See id.* With respect to Ms. Amoroso’s asserted busy schedule due to her fiancé’s medical needs, recent

wedding, and child-care responsibilities, these concerns at most go to the conditions of the requested deposition such as location, format, and duration, but not to whether it should occur at all. Ms. Amoroso has simply not met the burden to demonstrate that compliance with the subpoena would be unreasonable and oppressive compared to the potential relevance of Ms. Amoroso's anticipated testimony to this case.

A. Despite the motion's conclusory proclamations of lack of knowledge, available evidence indicates Ms. Amoroso very well may possess relevant information—even if unbeknownst to her.

One of the primary arguments that Ms. Amoroso's motion makes is the conclusory statement that she has no "knowledge relevant to whether Mr. Coopridier poisoned Ms. Davis with misoprostol and murdered her unborn child." [Dkt. 110 at 2.] Respectfully, it is neither the witness's nor Plaintiff Liana Davis's purview to determine unilaterally whether Ms. Amoroso's potential testimony is relevant or not. One key question in this case is of course whether Ms. Davis's pregnancy was lost, as she alleges, the night of April 5-6, 2025 through intentional actions of Mr. Coopridier or whether, instead, Ms. Davis suffered a natural miscarriage prior to or on that night. Mr. Coopridier is aware and has produced in this case copies of text messages from Ms. Davis from April 4, 2025 wherein Ms. Davis says she was cramping, scared of miscarrying in public, and concerned about being on her feet in the heat for 4 hours at a carnival with her three children. *See* Exhibit 2, Excerpts of Texts between Davis and Coopridier. Ms. Davis then texted Mr. Coopridier that her "sister thinks I need to take the kids and go to the ER" and that her sister said her kids would "much prefer a baby bro/sis over a carnival. Priorities." These messages alone suggest that Ms. Amoroso had some level of knowledge of Ms. Davis's pregnancy in April 2025, as well as concerns that she may have been miscarrying—prior to the events of April 5-6, 2025.

Ms. Amoroso's motion and supporting declaration further assert that she no longer has any text messages with Ms. Davis from the April 2025 time period because she apparently deletes all text messages once a week. If so, Mr. Coopriider should be allowed to inquire as to the reason for these deletions, when they began, whether any potential backup copies could be accessible through cloud-based systems, etc. if for no other reason than to explore potential spoliation of evidence claims.

B. Ms. Amoroso's alleged scheduling concerns are insufficient and could easily be alleviated with reasonable accommodations.

The Motion to Quash claims that Ms. Amoroso is effectively simply too busy to appear for a deposition in this case. However, in her initial responsive communications to Mr. Coopriider's counsel after receipt of the subpoena, Ms. Amoroso indicated that she would like to do the deposition remotely if possible and that sooner rather than later was better for her schedule given the then-upcoming wedding, but that she was "happy to give testimony to the best of my memories." *See generally* Exhibits 3, 4, Emails Between Beth Klein and Amy Amoroso. As already indicated, Mr. Coopriider's counsel are willing to cooperate with the witness on reasonable accommodations for scheduling, location, and format for this deposition—which is not anticipated to take long. Additionally, many of Ms. Amoroso's cited scheduling concerns, such as her wedding of August 1, are presumably no longer at issue. In any event, however, given the clear potential relevance of Ms. Amoroso's knowledge and testimony, the logistical and scheduling concerns raised in her motion simply do not meet the high standard required to completely prevent/quash the subpoenaed deposition.

C. The document request for texts, emails, and voice messages is justified.

The motion to quash argues that the deposition subpoena's accompanying document request for texts, emails, and voice messages between Liana Davis and Amy Amoroso regarding specifically relevant topics to this lawsuit is unduly burdensome because the same information is available from

Ms. Davis's devices that have already been produced to the appointed electronic forensics vendor. This is not necessarily accurate, and in any event, Mr. Coopridier is not required to rely solely on Ms. Davis's own production of such potentially relevant communications. This is not a sufficient basis to object to the perfectly valid document request accompanying the deposition subpoena.

III. PRAYER

WHEREFORE, Defendant Christopher Coopridier respectfully requests this Court deny Non-Party Amy Amoroso's Motion to Quash Subpoena [Dkt. 110] and permit Coopridier to re-notice the requested deposition and serve a revised subpoena on Ms. Amoroso's apparent counsel, Mr. Jonathan Mitchell. Defendant also requests such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Craig Dupen

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**ATTORNEYS FOR DEFENDANT
CHRISTOPHER COOPRIDER**

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2026, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

By: /s/ Craig Dupen
Craig Dupen

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

Liana Davis,

Plaintiff,

v.

Christopher Coopridier,
Aid Access GmbH, &
Rebecca Gomperts,

Defendants.

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Case No. 2:25-cv-220

DECLARATION OF CRAIG DUPEN

I, Craig Dupen am over the age of 18 and fully competent in all respects to make this declaration. I have personal knowledge of the facts stated in this declaration, and all of these facts are true and correct.

1. I am an attorney for Christopher Coopridier in this case, and I submit this declaration alongside Coopridier's Response to Non-Party Amy Amoroso's Motion to Quash Subpoena [Dkt. 110].

2. The document attached as Exhibit 2 to Coopridier's Response to Non-Party Amy Amoroso's Motion to Quash Subpoena is an authentic copy of an excerpted page from Coopridier's document production in this case of text messages between Coopridier and Plaintiff Liana Davis.

3. The documents attached as Exhibits 3 and 4 to Coopridier's Response to Non-Party Amy Amoroso's Motion to Quash Subpoena are authentic copies of emails sent between my co-counsel Beth Klein and fact witness Amy Amoroso regarding scheduling her deposition.

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

/s/ Craig Dupen
Craig Dupen

Received	4/4/25 3:59 PM	Liana Davis (+14122957136)	14122957136	Liked “Yeah i called and they said it's at the lab. The results should be in by tomorrow morning. Apparently that labs IT shut down this past Monday and Tuesday, so they've been having issues”
Received	4/4/25 4:03 PM	Liana Davis (+14122957136)	14122957136	I'm scared. I'm on my way to an outdoor carnival with my kids all by myself and I will be on my feet in the heat for the next 4 hours. Tell me it's gonna be OK.
Sent	4/4/25 4:05 PM	Liana Davis (+14122957136)		You'll be fineeee
Received	4/4/25 4:05 PM	Liana Davis (+14122957136)	14122957136	I'm scared of miscarrying in public when I'm alone a 25 minute drive from u.
Received	4/4/25 4:06 PM	Liana Davis (+14122957136)	14122957136	FYI, I will be at Windsor Park Elementary school on Alameda
Sent	4/4/25 4:08 PM	Liana Davis (+14122957136)		You've done everything you could to not miscarry..
Sent	4/4/25 4:08 PM	Liana Davis (+14122957136)		I'm sure it'll be fine
Received	4/4/25 4:09 PM	Liana Davis (+14122957136)	14122957136	Questioned “You've done everything you could to not miscarry..”
Received	4/4/25 4:10 PM	Liana Davis (+14122957136)	14122957136	What do you mean to not miscarry?
Received	4/4/25 4:10 PM	Liana Davis (+14122957136)	14122957136	I actually stopped taking the progesterone a week ago.
Received	4/4/25 4:11 PM	Liana Davis (+14122957136)	14122957136	Even tho they didn't tell me I had to do this, I just wanted to wait until a week past when I took the antibiotics before reaching up there. 🤞🍷
Received	4/4/25 4:11 PM	Liana Davis (+14122957136)	14122957136	I was honestly too grossed out to put the pill up there.
Received	4/4/25 4:12 PM	Liana Davis (+14122957136)	14122957136	Now that you know I haven't been taking that, do you think I should be worried?
Sent	4/4/25 4:14 PM	Liana Davis (+14122957136)		Sure you're still fine
Sent	4/4/25 4:14 PM	Liana Davis (+14122957136)		You've cramped like this before and nothing came out
Received	4/4/25 4:14 PM	Liana Davis (+14122957136)	14122957136	Loved “Sure you're still fine”
Received	4/4/25 4:14 PM	Liana Davis (+14122957136)	14122957136	Liked “You've cramped like this before and nothing came out”
Received	4/4/25 4:50 PM	Liana Davis (+14122957136)	14122957136	My sister thinks I need to take the kids and go to the ER. I'm trying not to panic.
Received	4/4/25 4:50 PM	Liana Davis (+14122957136)	14122957136	In her words, "They will much prefer a baby bro/sis over a carnival. Priorities."
Sent	4/4/25 4:55 PM	Liana Davis (+14122957136)		Do what you gotta do
Received	4/4/25 4:55 PM	Liana Davis (+14122957136)	14122957136	I do NOT want to do that.
Sent	4/4/25 4:55 PM	Liana Davis (+14122957136)		I think you'll be fine
Received	4/4/25 4:55 PM	Liana Davis (+14122957136)	14122957136	I'm just so freaked out.
Received	4/4/25 4:55 PM	Liana Davis (+14122957136)	14122957136	Loved “I think you'll be fine ”

From : ami.marie@myyahoo.com
To : beth@bethklein.com
Sent : 7/13/2026 7:10PM
Subject : Re: Subpoena from Christopher Cooprider

You don't often get email from ami.marie@myyahoo.com. [Learn why this is important](#)

Ok, well to try to sort things, my fiance was victim of a terrible work injury 3 weeks ago and has a lot of medical follow ups after 3 weeks in hospital that I have to transport him to (he cannot drive yet). In addition to that I am a working single mom of two and lastly have houseguests coming in that week for our wedding on 8/1. Is there anyway to accelerate things? I'm not trying to be uncooperative, but I have a ton going on right now.

As for evidence, I don't have any to provide, as this all happened over a year ago. I'm happy to give testimony to the best of my memories.

Thank you
Amy Amoroso

Sent from my iPhone

On Jul 13, 2026, at 20:03, Beth Klein <beth@bethklein.com> wrote:

1. We need to collect all the evidence that we have requested in the subpoena. This requires you to appear at the location to turn over the evidence. Ms. Davis' attorney is copied, and he may have objections.
2. I am fine with you appearing for questioning remotely.
3. We can work on dates, but this must be coordinated with all counsel and scheduling is tight.

Thank you

Beth Klein
Via mobile

From: Amy Amoroso <ami.marie@myyahoo.com>
Sent: Monday, 13 July 2026 17:46:08
To: Beth Klein <beth@bethklein.com>
Subject: Subpoena from Christopher Cooprider

You don't often get email from ami.marie@myyahoo.com. [Learn why this is important](#)

Ms. Klein,

I received a subpoena from Christopher Cooprider this evening for 27 July 2026. It offers the option of Zoom. I am requesting this option due to scheduling. Additionally, if we could

do this sooner than later, I would appreciate it.

Thank you,
Amy Amoroso

From : ami.marie@myyahoo.com

To : beth@bethklein.com

Sent : 7/20/2026 5:22PM

Subject : Re: Your deposition

Thank you. That is wonderful news as my life is all over the place right now.

Have a good night!

Amy amoroso

Sent from my iPhone

On Jul 20, 2026, at 15:47, Beth Klein <beth@bethklein.com> wrote:

Good afternoon Amy,

The Court is considering a motion about your deposition scheduled for July 27, 2026. At this time, it is off calendar until we get a ruling.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary](#) [Website](#)

350 Market Street, Suite 310 Basalt CO 81621

<image001.png>

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

Liana Davis,

Plaintiff,

v.

Christopher Coopridner,
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Rebecca Gomperts,

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Case No. 2:25-cv-220

ORDER DENYING NON-PARTY AMY AMOROSO'S
MOTION TO QUASH SUBPOENA

On July 8, 2026, Defendant Christopher Coopridner ("Defendant") subpoenaed Non-Party Amy Amoroso to testify at a deposition. On July 27, 2026, Non-Party Amy Amoroso filed a Motion to Quash Subpoena (the "Motion") [Dkt. 110]. Having considered the Motion, responses if any, and arguments of counsel, if any, the Court finds that the Motion should be **DENIED** and Non-Party Amy Amoroso should appear to testify at a deposition.

It is therefore **ORDERED** that Non-Party's Motion is, in all things, **DENIED**.

SIGNED this ____ day of _____, 2026.

United States District Judge