

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

Liana Davis,	*	
Plaintiff,	*	
	*	
v.	*	Case No. 2:25-cv-220
	*	
Christopher Cooprider, et al.	*	
Defendants.	*	

**MOTION FOR LEAVE OF COURT TO FILE SUPPLEMENTAL RESPONSE TO
PLAINTIFF’S MOTION TO DISMISS
DEFENDANT CHRISTOPHER COOPRIDER’S COUNTERCLAIMS**

COMES NOW Counter-Plaintiff Christopher Cooprider (“COOPRIDER”) and files his Request for Leave of Court to file his Supplemental Response to Plaintiff’s Motion to Dismiss COOPRIDER’s Counter Claims (Doc. 22).

Undersigned certifies that she conferred with opposing counsel who objects.

In response to the Complaint (Doc. 1) filed by Plaintiff Liana Davis (“DAVIS”), COOPRIDER filed an Answer and Counterclaims (Doc. 7), alleging malicious prosecution, intentional infliction of emotional distress, fraud, and malice. DAVIS then filed a Motion to Dismiss (“MTD”) these Counterclaims under Rule 12(b)(6). (Doc. 22) COOPRIDER filed his Response to the MTD on October 28, 2025 (Doc. 25) DAVIS filed her Reply on November 11, 2025 (Doc. 28).

Subsequently, new evidence has arisen concerning the basis for DAVIS’S MTD COOPRIDER’S malicious prosecution claim. On January 6, 2026 at 1:30 am, DAVIS provided Responses to COOPRIDER’S First Set of Requests for Production to Davis served on September 8, 2025. (“RFP”) (Exhibit A) Within the Responses to the RFP, an email from Michael Manzano to Liana Webster aka DAVIS dated May 29, 2025 was produced. (Exhibit B). This email sent to

DAVIS three months prior to her commencement of this action and well before DAVIS filed her MTD the malicious prosecution claim. The official email from law enforcement read:

I just wanted to update you as I know you have been waiting to hear the outcome of your report. After a long and extensive investigation, the incident was staffed with the Nueces County District Attorneys Office. The Head elected DA reviewed the case. It was the NCDAO and CCPD's decision to not move forward with any charges. The case will be deemed UNFOUNDED as there was no crime that can be proven to have occurred. In criminal cases there must be probable cause and a case MUST be proven or able to be proven beyond a reasonable doubt. Unfortunately, after speaking with medical professionals (Medical staff, OBGYN), forensic pathologist, etc. It was deemed that the allegation could not be proven. It was also informed to us and in records that you were documented as a "unhealthy pregnancy" with very low levels. We learned that due to this information and not taking your medication as instructed the medical opinion given to us, was that you most likely may have had a natural miscarriage. There was no way to prove otherwise, and no medical professional would and will not give any other ruling to include the medical examiner's office they advised.

DAVIS knew on May 29, 2025 that the Head District Attorney of the Nueces County District Attorney's Office "NCDAO") reviewed her criminal complaint. Prior to filing this case, DAVIS knew that both the NCDAO and Corpus Cristi Police Department would not file criminal

charges against COOPRIDER and had deemed her allegations as UNFOUNDED. She was told that her pregnancy terminated in a natural miscarriage and that there was “no way” to prove otherwise and no medical professional would give any opinion that she was poisoned.

DAVIS moved to dismiss the *malicious prosecution* claim because “the proceedings that Ms. Davis has initiated against him have not terminated” and because COOPRIDER cannot state a claim “until after he prevails and after all appeals are exhausted.” (Doc. 22, p. 1). “So Coopriders’s proposal to “abate” the malicious-prosecution counterclaim is a bootless exercise, as these proceedings must come to a complete end before any malicious-prosecution claim can be considered.” *Id.* The Court should dismiss the malicious-prosecution counterclaim under Rule 12(b)(6).” But on May 29, 2025 DAVIS was told directly that the Criminal Investigations were closed and her allegations were UNFOUNDED. DAVIS knew that the malicious prosecution case was ripe, but filed a motion claiming otherwise and opposing abatement as “bootless.”

DAVIS was told point blank that no medical expert would provide an opinion that the termination of her pregnancy with anything other than a **natural termination — not by poisoning**. DAVIS knew the criminal proceedings had been terminated prior to filing suit and prior to filing her MTD. Nonetheless, knowing these facts DAVIS filed her baseless motion to dismiss the counterclaim of malicious prosecution.

For these additional reasons, COOPRIDER respectfully requests leave of court to file his Supplement attached as Exhibit C and again moves the Court to deny DAVIS’s Motion to Dismiss concerning his counterclaim for malicious prosecution.

January 8, 2026

Respectfully submitted,

BETH KLEIN, PC

By: /s/ Beth A. Klein
Beth A. Klein

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ATTORNEY-IN-CHARGE

ATTORNEYS FOR
CHRISTOPHER COOPRIDER

CERTIFICATE OF SERVICE

I certify that on January 8, 2026 I SERVED the foregoing Request for Leave via email on all counsel of record.

/s/ Beth A. Klein
Beth A. Klein

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 Liana Davis's First 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.

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.

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.

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). The other requested communications will be produced.

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.

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 Davis000001–000141.

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 will be produced.

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 will be produced.

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. Cooprider in her possession, custody, and control. Ms. Davis is producing photographs “of” Mr. Cooprider in her possession, custody, and control, which can be found at Davis000141–144.

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). The other requested audio, visual and/or digital files will be produced.

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
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Dated: January 6, 2026

Counsel for Plaintiff Liana Davis

CERTIFICATE OF SERVICE

I certify that on January 6, 2026, I served this document by e-mail upon:

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



Michael Manzano

5/29/25

To: >

Good morning,

I just wanted to update you as I know you have been waiting to hear the outcome of your report. After a long and extensive investigation, the incident was staffed with the Nueces County District Attorneys Office. The Head elected DA reviewed the case. It was the NCDAO and CCPD's decision to not move forward with any charges. The case will be deemed UNFOUNDED as there was no crime that can be proven to have occurred. In criminal cases there must be probable cause and a case MUST be proven or able to be proven beyond a reasonable doubt. Unfortunately, after speaking with medical professionals (Medical staff, OBGYN), forensic pathologist, etc. It was deemed that the allegation could not be proven. It was also informed to us and in records that you were documented as a "unhealthy pregnancy" with very low levels. We learned that due to this information and not taking your medication as instructed the medical opinion given to us, was that you most likely may have had a natural miscarriage. There was no way to prove otherwise, and no medical professional would and will not give any other ruling to include the medical examiner's office they advised.

There were other factors as well that played a part, nevertheless the decision was made. The Attorney General's Office has not been made aware and had no bearing on the denied financial assistance you asked about. I would defiantly reach out to them as they notified you that you could.

Thanks for being patient and I hope you are in better health.

Det. Michael Manzano #6744

Criminal Investigations Division

Corpus Christi Police Dept.

321 John Sartain CC TX 78401

Desk: 361-886-2891

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Subsequently, new evidence has arisen concerning the basis for DAVIS’S MTD COOPRIDER’S malicious prosecution claim. On January 6, 2026 at 1:30 am, DAVIS provided Responses to COOPRIDER’S First Set of Requests for Production to Davis served on September 8, 2025. (“RFP”) (Exhibit A) Within the Responses to the RFP, an email from Michael Manzano to Liana Webster aka DAVIS dated May 29, 2025 was produced. (Exhibit B). This email sent to

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DAVIS knew on May 29, 2025 that the Head District Attorney of the Nueces County District Attorney's Office ("NCDAO") reviewed her criminal complaint. Prior to filing this case, DAVIS knew that both the NCDAO and Corpus Cristi Police Department would not file criminal

charges against COOPRIDER and had deemed her allegations as UNFOUNDED. She was told that her pregnancy terminated in a natural miscarriage and that there was “no way” to prove otherwise and no medical professional would give any opinion that she was poisoned.

DAVIS moved to dismiss the *malicious prosecution* claim because “the proceedings that Ms. Davis has initiated against him have not terminated” and because COOPRIDER cannot state a claim “until after he prevails and after all appeals are exhausted.” (Doc. 22, p. 1). On May 29, 2025 DAVIS was told directly that the Criminal Investigations were closed and her allegations were UNFOUNDED. DAVIS knew that the malicious prosecution case was ripe, but filed a motion claiming otherwise.

DAVIS was told point blank that no medical expert would provide an opinion that the termination of her pregnancy with anything other than a **natural termination — not by poisoning**. DAVIS knew the criminal proceedings had been terminated prior to filing suit and prior to filing her MTD. Nonetheless, knowing these facts DAVIS filed her baseless motion to dismiss the counterclaim of malicious prosecution.

For these additional reasons, COOPRIDER respectfully again moves the Court to deny DAVIS’s Motion to Dismiss concerning his counterclaim for malicious prosecution.

January 8, 2026

Respectfully submitted,

BETH KLEIN, PC

By: /s/ Beth A. Klein
Beth A. Klein

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