

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, et al.	*	
Defendants.	*	

**FRCP 29(B) MOTION FOR SHORTENED TIME TO RESPOND TO ESI DISCOVERY,
TO COMPEL PRODUCTION OF DAVIS’S DEVICES AND ACCESS TO HER iCloud
AND REQUEST FOR DISCOVERY HEARING**

COMES NOW Counter-Plaintiff Christopher Coopriider (“COOPRIDER”) and files his FRCP 29(b) Motion for Shortened Time to Response to ESI Discovery and Request for Discovery Hearing. Undersigned counsel certifies that she conferred with opposing counsel who could not agree to this relief.

1. This matter is well-known to the Court, and COOPRIDER’S counsel’s work and the labored history of the Court’s intervention to obtain discovery responses from Liana Davis (“DAVIS”) are well- documented. Briefly,

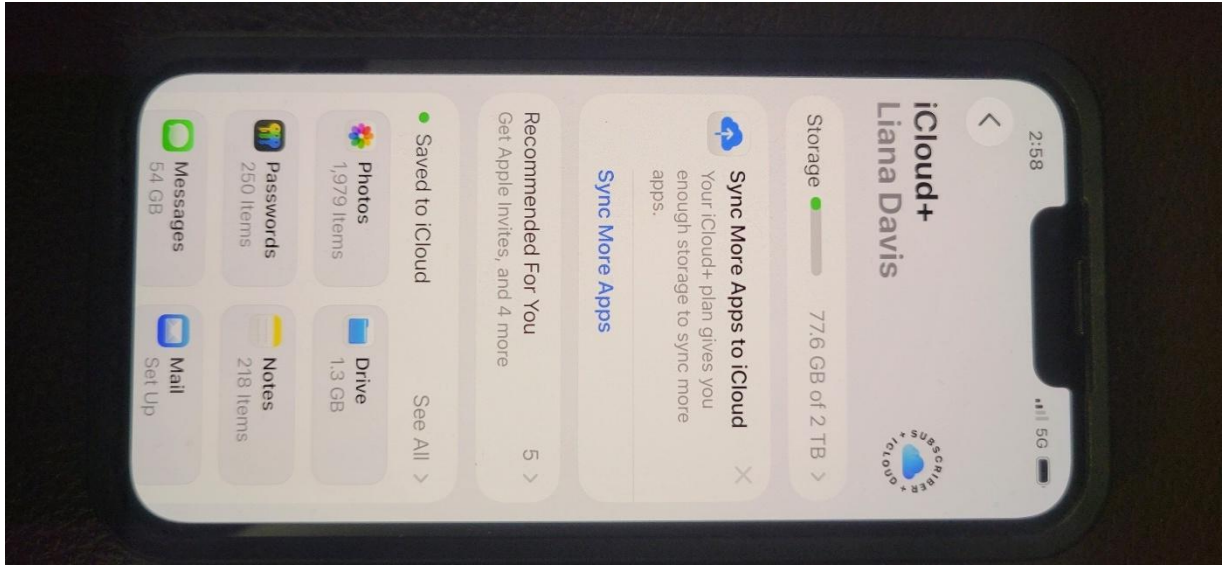
- On March 11, 2026, a Pre-Motion Conference was held in order to obtain the Response to Request for Production No. 2 **which had been pending since September 2025**, communications between DAVIS and certain individuals. A Minute Order set a deadline of **March 25, 2026** at 3:00 pm Central Time - two weeks to provide the communications. DAVIS did not comply.
- **March 27, 2026** a Motion to Compel was Filed.
- On March 27, 2026, March 30, 2026, and April 8, 2025 partial texts were received after the Motion to Compel was on record.
- **April 10, 2026** Status Report were filed. DAVIS signed Declarations claiming all communications had been produced.
- **April 14, 2026** A Status Hearing was finally held (after moving the hearing for the convenience of DAVIS) during which preservation of cell phones by making mirror

images of the devices was agreed upon by counsel for the Parties and believed to be an oral order of the Court.

- **April 28, 2026** A Status Report indicating that Liana Davis was uncooperative was filed with the Court:

The parties have agreed to George Vasiliou as a joint expert to extract the data from both parties' telephones. Mr. Vasiliou will secure the data and securely hold it until further ESI orders/direction are received. The extraction is scheduled for May 1, 2026, and Mr. Vasiliou will have both parties bring their phones to him. (Location TBD) The serial number, make and model number of Ms. Davis's telephones has been requested and is pending. A proposed joint protective order has been circulated, and comments from Plaintiff are pending.

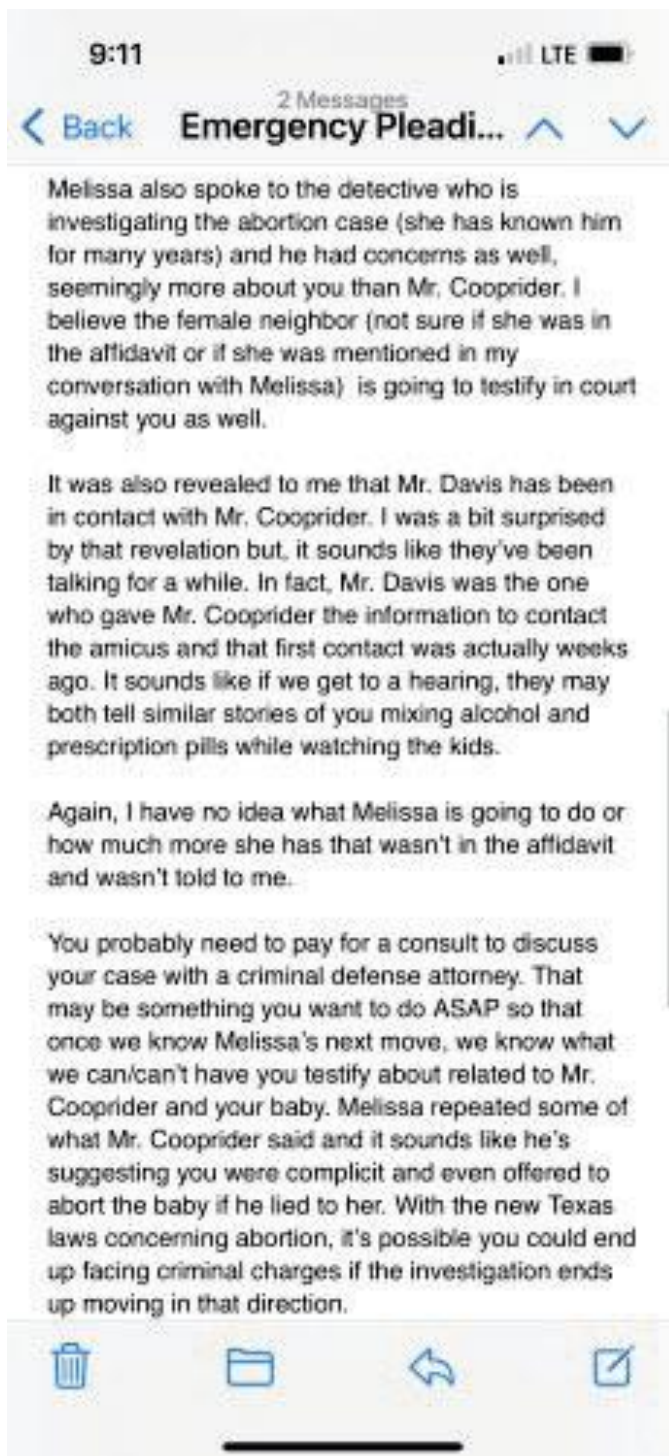
- **May 4, 2026** A Protective Order was agreed and filed. The Court entered the Order with modifications. Geroge Vasiliou (“Expert”) signed the Protective Order Addendum.
- **May 4 – May 11, 2026** DAVIS will not cooperate with producing her phone or other devices claiming that there is not a written Court Order. Mitchell and Klein worked on stipulations to make the production bilateral, efficient and fair to appease DAVIS. The production is expanded to phones and computers so that the Expert will only make one trip. DAVIS refused. No stipulation was signed. Last draft attached as Exhibit A.
- **May 11, 2026** Expert arrived in Corpus Cristi and Coopriider provided his phone and computers to the Expert without delay. DAVIS continues delay tactics and refuses to produce her computer. Next DAVIS demands that a phone be purchased for her to use while her I-phone is copied despite the fact that she has a phone available at her home with her live in boyfriend. DAVIS insists that the Expert go to her house to pick up her phone and deliver it to her. DAVIS demands that the Expert return the phone in the middle of the night if it is complete. Davis refuses to produce her computer against recommendation of her attorney. See Exhibit B.
- **May 12, 2026** Expert makes mirror image of DAVIS’s phone and stays up all night to alert DAVIS when her phone is complete. In checking to make sure all data was copied; Expert notes that 54 GB of I Messages TEXT message data is on DAVIS’s iCloud and not on iPhone **and cannot be accessed**. Expert notes that unusually large chunks of data have been moved and becomes concerned about the preservation of the evidence.



2. A subpoena was served on Verizon to obtain meta data. A MOTION TO ENFORCE NON-PARTY SUBPOENA was filed when Verizon did not respond . [Docket No. 62]. After filing the Motion Verizon notified COOPRIDER’S Counsel that the meta data prior to May 4, 2026 was permanently gone. Docket No. 62 is Moot.

3. The importance of full responses to discovery from DAVIS is critical. Her DEVICES and iCloud may be the sole source of the evidence. Time is of the essence. DAVIS’s deposition is set for May 28, 2026. Expert reports are due August 1, 2026.

4. Additional text messages with YVONNE YAKOPOVICH were provided on May 11, 2026 that DAVIS has sworn under oath twice did not exist. See Docket 42- 2 and Docket 50-2. Included in those text messages are communications from DAVIS’s own family law lawyer that DAVIS disclosed to YVONNE YAKOPOVICH. **DAVIS’s own lawyer advised DAVIS to get criminal defense counsel for DAVIS’s potential criminal liability in the death of Baby Joy.**





5. Critical texts between DAVIS and Ami Amoroso, her sister on April 3, 2025, two days before the event at issue, when DAVIS was experiencing severe front and back cramping indicative of a miscarriage and urged to go to the ER are claimed to be “**gone.**”

6. The delay and misdirection caused by DAVIS have been astonishing -- and expensive. Undersigned counsel has spent an extraordinary amount of time on this simple matter and has lost money on air travel ticket changes. The delay should no longer be tolerated, and it is abundantly clear that DAVIS is an untrustworthy gatekeeper of evidence.

7. On May 13, 2026, COOPRIDER served ESI discovery on DAVIS, and redacted copy is attached as Exhibit C (a fully copy has been provided to Chambers). The only action required of DAVIS is to turn over her computers and provide access to her iCloud. Otherwise, all searches for the ESI will be conducted by the Expert. There is significant risk that the evidence DAVIS possesses will be moved to an inaccessible location, altered or destroyed.

8. Plaintiff requests that DAVIS be ordered to immediately produce all DEVICES and access to her iCloud as defined in the ESI requests. Plaintiff further requests that the forensic expert be immediately permitted to conduct the ESI searches on the limited data extracted from DAVIS's iPhone and analyze the movement of chunks of data.

WHEREFORE, Pursuant to FRCP 29(b) COOPRIDER requests that the production of all DEVICES and access to the iCloud be ordered for preservation imaging, and that the Expert be ordered to immediately extract the ESI from the mirror image of DAVIS's phone as requested, and

that a hearing be held. For these reasons, COOPRIDER respectfully requests this relief and a discovery hearing.

May 14, 2026

Respectfully submitted,

BETH KLEIN, PC

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

BETH KLEIN, P.C.
Colorado Bar No. 17477
S.D. Tex. I.D. No. 3934133
beth@bethklein.com
350 Market Street, Suite 310
Basalt, Colorado 81621
Telephone: (303) 448-8884

WATTS LAW FIRM LLP
Texas State Bar No. 20981820
Federal Bar ID # 12419
mikal@wattslp.com
811 Barton Springs #725
Austin, Texas 78704
Telephone: (512) 479-0500
Facsimile: (512) 479-0501
ATTORNEY-IN-CHARGE

ATTORNEYS FOR
CHRISTOPHER COOPRIDER

CERTIFICATE OF SERVICE

I certify that on May 14, 2026 I SERVED the foregoing via ECF 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.

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

Defendants.

Case No. 2:25-cv-220

STIPULATION AND PROPOSED ORDER

The parties agree and stipulate as follows:

1. Christopher Cooprider will produce any and all cell phones, tablets, and personal computers that he used between November 1, 2024, and the present, to George Vasiliou on Tuesday, May 11, 2026 at 4:00 pm at the Hyatt Place, 6773 S Padre Island Dr, Corpus Christi, TX 78412. Cooprider designates all data recovered from these devices as "Confidential" under the Protective Order entered in this matter.

2. Liana Davis will produce any and all cell phones, tablets and personal computers that she used between November 1, 2024, and the present, to George Vasiliou on Monday, May 11, 2026 at 5:00 pm. These devices will be picked up, and a phone will be purchased and provided to Davis while the extraction occurs. Davis designates all data recovered from these devices as "Confidential" under the Protective Order entered in this matter.

3. Both parties will provide all passwords and pins, including passwords to any cloud storage and/or back-up systems such as Google to Mr. Vasiliou when they produce their devices. Both parties will be available if Mr. Vasiliou needs additional codes to recover any data.

4. Both parties will permit Mr. Vasiliou all of the time that he requires to prepare the mirror images.

5. Both parties will retrieve their devices, examine them, and certify that they have received all of their devices in good working order when the process is complete. Mr. Vasiliou will contact each party and provide a specific time to retrieve their devices so that the parties will not encounter each other.

6. Mr. Vasiliou will extract and preserve the data on these devices for future searches and ESI examinations.

7. Mr. Vasiliou has signed Exhibit A to the Protective Order.

8. Mr. Vasiliou will make mirror images of the drives of the devices. He will secure and securely hold the data evidence as a custodian for the duration of the case. At the conclusion of the case, Mr. Vasiliou will destroy all of the data evidence and passwords and will provide a certification of destruction.

9. Mr. Vasiliou will not examine or search the data evidence until he is provided with either a stipulation signed by both parties or an order of the Court..

10. Mr. Vasiliou will provide a statement for his time and travel expenses, and these costs will be shared equally.

11. Mr. Vasiliou purchased a phone for Davis, and Davis is responsible for this cost.

A proposed order is attached to this stipulation.

/s/ Jonathan F. Mitchell
Jonathan F. Mitchell
Attorney-in-Charge

/s/ Beth Klein
Beth Klein
Attorney for Defendant

- **AND** -

Mikel C. Watts
Attorney-in-Charge
Texas State Bar No. 20981820
Federal Bar ID: #12419
Mikel@wattsllp.com
WATTS LAW FIRM, LLP
811 Barton Springs #725
Austin, Texas 78704
Telephone: (512) 479-0500
Facsimile: (512) 479-0501

AND -

Barry A. Moscovitz
Texas State Bar No. 24004830
Federal Bar ID No. 31054
bmoscovitz@thompsoncoe.com
THOMPSON, COE, COUSINS & IRONS, LLP
700 North Pearl Street, 25th Floor
Dallas, Texas 75201
Telephone: (214) 871-8200
Facsimile: (214) 871-8209

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2026, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system and served on all counsel.

/s/ Beth Klein
Beth Klein

From: Beth Klein
Sent: Tuesday, May 12, 2026 6:48 AM
To: Jonathan Mitchell <jonathan@mitchell.law>; Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>
Subject: One more try

Jonathan

Can you try one more time to convince Davis to let her laptop get copied tonight? I know you have done a heroic lift already just to get the phone.

Does she really want to be painted as an evidence destroyer and hider? I have started the motion and with all the new evidence in the latest text drop -- it's so damning.

We need all of her communications with her friend at the pregnancy center and the network listed in the RFPs. I think there are emails - not only texts. It looks like there are more emails with Detective Mancuso that we don't have. We still need her communications with Ami Amoroso and her mom. She's been stalking Chris and having her friends stalk him. We need all of those communications.

I hate this kind of litigation. Please let her know that her decision will have long term consequences. I want to give you the best chance to resolve this.

We need to take the depositions of Ami Amoroso in Georgia, her mom in Corpus, and her friend at the pregnancy center. Maybe we can knock out 2 the week of May 28?

Beth Klein
Mobile response

From: Beth Klein
Sent: Tuesday, May 12, 2026 1:25 PM
To: Jonathan Mitchell <jonathan@mitchell.law>
Cc: Moscovitz, Barry <bmoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>
Subject: RE: One more try

We have screenshots of texts with Ami Amoroso on **April 3** where Liana discusses that she believes she may be **miscarrying and is told to go to the ER**. We have no emails at all, but there are emails in the production from yesterday. We don't have any communications Anna Ziarko who she was communicating with on April 5 around midnight, Jana Pinson who is her friend at the Pregnancy Center... The RFP's are attached.

Is her computer an Apple because all the text and emails should copy to all devices and not necessarily get deleted simultaneously. Maybe we can recover the ones that are gone.

The only thing I can say is that hiding evidence never, ever goes well in the long run.

Beth Klein

303-448-8884

beth@bethklein.com

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621



From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Tuesday, May 12, 2026 12:04 PM

To: Beth Klein <beth@bethklein.com>

Cc: Moscowitz, Barry <bmoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>

Subject: Re: One more try

I will call her and try. If there's anything that you think would help persuade her, please let me know.

Do you have any e-mails that she sent to the individuals mentioned below that we failed to produce? If so I will let her know that. All of the e-mails should be on her phone though.

Please let me know if you think there are any communications that we failed to produce. I have gone through the Yvonne Yakopovich texts carefully and I'm confident that we've produced all responsive communications.

From: Beth Klein

Sent: Sunday, May 10, 2026 3:30 PM

To: Jonathan Mitchell <jonathan@mitchell.law>

Cc: Mikal Watts <mikal@wattsllp.com>; Moscowitz, Barry <bmoscowitz@thompsoncoe.com>; Talcott Franklin <tal@tfpc.me>

Subject: RE: draft stipulation and proposed order

Importance: High

Mr. Vasiliou will be in Corpus Cristi starting on Monday. My client will bring his devices to Mr. Vasiliou on Monday. Ms. Davis must bring her devices on Tuesday, May 12, 2026.

The updated Stip is attached with the addresses. The Stip is bilateral and addresses all concerns raised.

I have been emailing, texting and calling to get this resolved. If I don't hear from you tonight, I will file this as an emergency motion Monday AM and ask that my version be made a Court order.

Thank you.

Beth Klein

303-448-8884

beth@bethklein.com

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621

_____ BETH  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 Cooprider,	*	
Aid Access GmbH, &	*	
Rebecca Gomperts,	*	
	*	
Defendants.	*	

DEFENDANT CHRISTOPHER COOPRIDER'S FOURTH SET OF PRODUCTION OF DOCUMENTS TO PLAINTIFF LIANA DAVIS

PROPOUNDING PARTY: DEFENDANT CHRISTOPHER COOPRIDER

RESPONDING PARTY: PLAINTIFF LIANA DAVIS

YOU ARE HEREBY REQUESTED, pursuant to Rule 34 of the Federal Rules of Civil Procedure, to produce your current I-phone, all phones you have used between 1/1/2025 and the present and all computers you have used between 1/1/2025 and the present and iCloud remote storage ("DEVICES") for inspection of the following the designated electronically stored information The following data sources on cell phones and laptops shall be collected and collection must be forensically sound (write-blocked imaging, hash verification). A Motion will be filed to request immediate inspection of the DEVICES.

Source / Application	Data Types to Collect	Notes
Native SMS/iMessage (iOS)	Message content, timestamps, read receipts, deleted messages (via forensic tool)	Requires Cellebrite/GrayKey or equivalent; iCloud backup may preserve deleted msgs

Source / Application	Data Types to Collect	Notes
Android SMS/RCS	Message content, timestamps, delivery status, deleted messages	Varies by carrier; forensic extraction recommended
WhatsApp	Messages, attachments, call logs, group chats, deleted messages	Both device and cloud backup (Google Drive/iCloud) to be collected
Snapchat	Snaps, messages, My Eyes Only (if accessible)	Ephemeral; forensic extraction only; subpoena Snap Inc. for server-side data
Instagram DMs	Direct messages, shared media	Subpoena Meta; also check device cache
Facebook Messenger	Messages, calls, media	Subpoena Meta; device and cloud
Signal	Messages (if unencrypted backup exists), call logs	End-to-end encrypted; server-side subpoena unlikely to yield content
Email (all accounts)	Sent/received/deleted, attachments	Gmail, Outlook, Apple Mail; include all accounts on device
Browser History / Search	Search queries, visited URLs, autofill data	Incognito/private mode may limit; forensic tool may recover
Notes / Reminders Apps	Apple Notes, Google Keep, Samsung Notes, etc.	Check for drafts, deleted notes
Calendar / Scheduling Apps	Appointments, event details, reminders	Cross-reference with pharmacy visits, doctor appointments
Health / Fitness Apps	Apple Health, Fitbit, cycle tracking apps	May document physical symptoms, menstrual tracking
Photos / Videos	Images, videos, screenshots, metadata (GPS, timestamp)	EXIF data critical; cloud photo libraries

Source / Application	Data Types to Collect	Notes
Voicemails / Call Logs	All incoming/outgoing/missed calls	Include carrier CDRs via subpoena
Cloud Storage	iCloud Drive, Google Drive, Dropbox, OneDrive	May contain backup of deleted messages and files
Laptop – All of above	Browser history, email clients, iMessage (Mac), downloaded files, trash	Mirror forensic image required; hash verification

COLLECTION AND FORENSIC METHODOLOGY

A. Forensic Imaging Requirements

1. All cell phones and laptops shall be imaged using forensically sound methods that prevent alteration of the original evidence.
2. Acceptable tools include: Cellebrite UFED, Magnet AXIOM, GrayKey (for locked iOS), Oxygen Forensic Detective, FTK, EnCase, or court-approved equivalent.
3. A full physical extraction (not logical only) shall be performed where technically feasible to recover deleted data.
4. MD5 and SHA-256 hash values shall be documented for all forensic images and produced with collections.
5. Chain of custody documentation shall accompany all devices from seizure through production.

B. Mobile Device – Specific Collection Steps

1. Document device make, model, OS version, serial number, IMEI, and phone number before imaging.
2. Disable cloud sync and enable airplane mode prior to imaging to prevent remote wipe.
3. Collect from: internal storage, SIM card, SD card (if present), and linked cloud accounts.
4. Attempt recovery of deleted messages, deleted call logs, and deleted application data.
5. Collect app-specific containers for all messaging, email, browser, and health applications identified in Section IV.

C. Laptop / Computer – Specific Collection Steps

1. Full forensic image of hard drive (and SSD) using write blocker.
2. Collect browser history, downloads folder, trash/recycle bin (including deleted items), email client data files (.pst, .ost, .mbox), and cloud sync folders.
3. Recover deleted files using forensic tool file carving capabilities.
4. Document all user accounts on the device.
5. For Mac: collect iMessage database (~/.Library/Messages/chat.db), Notes, and iCloud-synced data.

PRODUCTION SPECIFICATIONS

Item	Specification
Production format – text messages	Native format (e.g., .db, .plist) AND human-readable PDF/HTML export with metadata intact
Production format – emails	Native .eml or .msg with full headers; PDF with metadata for review
Production format – documents	Native format (Word, PDF, Excel); no conversion that strips metadata
Metadata fields required	Custodian, file name, file path, date created, date modified, date last accessed, file size, MD5/SHA-1 hash, author, application
De-duplication	Global de-duplication permitted; produce de-duplication log identifying all family members
Load file	Concordance/DAT load file with image cross-reference (.opt) for document review platform
Bates numbering	Sequential; prefix DAVIS INSPECTION #

EXCLUSIONS

1. All COMMUNICATIONS between Liana Davis and Jonathan Mitchell, her attorney in this matter are excluded from production, as long as they have not been provided to third parties and the privilege waived. [REDACTED] and email jonathan@mitchell.law domain www.mitchell.law

2. All COMMUNICATIONS between Liana Davis and S. Dylan Pearcy, her family law attorney are excluded from production, as long as they have not been provided to third parties and the privilege waived. Domain www.dylanpearcylaw.com

3. All COMMUNICATIONS between Liana Davis and Talcott Franklin tal@tfpc.me domain www.tfpc.me are excluded from production as long as they have not been provided to third parties and the privilege waived.

DEFINITIONS

The definitions below are incorporated into EACH request for production (the “Requests”).

1. “YOU” AND “YOUR” means Plaintiff LIANA DAVIS Cell phone number 4[REDACTED] & Email [L\[REDACTED\]@\[REDACTED\].com](mailto:L[REDACTED]@[REDACTED].com) and two hidden emails on iCloud.
2. “COMMUNICATION(S)” the terms “communication” and “communicate” refer to any method used to transmit or exchange information, concepts, or ideas (whether verbal or nonverbal) including oral, written, typed, or electronic transmittal of any type of information or data, by the use of words, silence, numbers, symbols, images, or depictions, from one person or entity to another person or entity.
3. “DOCUMENT(S)” the terms “document” and “documents” refer to any electronically stored information – including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations – stored in any medium from which information can be obtained **not** transmitted from one person or entity to another person or entity.

Request No. 1 Produce all DEVICES for extraction of all COMMUNICATIONS and DOCUMENTS in native format between YOU and any other person or entity from January 1, 2025 to the present, excluding your attorneys, using the following words. Boolean connectors (OR, AND) and proximity operators (w/5, w/10) should be used as indicated. All searches should be case-insensitive.

Category	Search Terms / Keywords
Abortion-inducing medication	misoprostol OR mifepristone OR miso OR "abortion pill" OR "Plan B" OR "morning after" OR RU-486 OR methotrexate OR cytotec OR "terminate pregnancy" OR "end pregnancy" OR "medication abortion" OR pills OR pill OR "internet pills"
Ingestion	Poisoned OR "put in my drink" OR bitter OR diarrhea OR spoons OR "anything in my drink" OR swallow OR swallowing Or Weird OR drink OR "internet pills" OR "empty pill bottle" OR "poison control" OR crushed OR put alcohol" OR rinsed OR spiked OR "funny taste" OR "bitter taste" Or stirring OR "closing a container" OR stir OR stirred OR "next to my purse" OR "dog out" OR "go to the ER" OR "unknown amount of" OR "intentionally delaying" OR "spoon stirring" OR "mixed into my drink"
Pregnancy / Complications	pregnant OR pregnancy OR "test" OR "positive" OR "negative" OR "missed period" OR "OB" OR "OBGYN" OR "prenatal" OR ultrasound OR miscarriage OR "bleeding" OR "February 2, 2025" OR "ovulation strips" OR ultrasound OR hCG OR weeks OR puke OR puking OR bump OR geriatric OR weeks OR baby OR OB/GYN OR Gyno OR obstetrician OR "obstetrician's office" OR "home test"
Cover-up	"don't tell" OR "keep quiet" OR "can't know" OR "nobody knows" OR "haven't told" OR "just between us" OR secret OR hide OR cover OR "get rid" OR "take care of it" OR blackmail Or delete OR deleting OR destroy OR lied OR lied OR lying OR record OR recorded OR recordings OR wipe OR discovery OR "do not use his name in texts" OR "March 24, 2025"
Physical / emotional reactions	sick OR cramping OR cramp OR bleeding OR pain OR "didn't feel well" OR "felt off" OR scared OR hospital OR ER OR "urgent care" OR "called the doctor" OR clamy OR chlamydia OR gush OR gushing OR terminate OR fever OR temperature OR temp OR discharge OR "bail on me" OR disrespectful
Health Conditions	Progesterone OR temperature OR temp OR burning OR "burning up" OR geriatric OR STI OR chlamydia OR antibiotic OR insert OR "red bull" OR pre-workout OR migraine OR "not eating" OR "being sick could have hurt it?" OR pain OR inflammation OR "chronic pain" OR "pain level" OR alcohol OR "grown-up drink" OR booze OR buzzed OR drunk OR "if it's alive" OR "online patient portal"

Category	Search Terms / Keywords
Wrongful Prosecution	USMJ OR police OR Mancuso OR DA OR "District Attorney" OR prosecute OR "Marines Family Advocacy Program" or FAP or "Police Chief" or "Pregnancy Center of Coastal Bend" or NCIS OR scrubbing OR "legal hold" OR criminal charges" OR sanctions OR murderer OR murder OR "violent crime" OR nail OR rip OR military benefits" OR CCPD OR "post on Facebook" OR "felony charges" OR UCMJ OR Crime OR 2504060017 OR "Crime Victim's Compensation Fund" OR CVC OR "Bertha Aguas" OR "slap him" OR "shut him up" OR "take his medicine" OR "destroy"
Pregnancy Termination	Miscarriage OR gush OR gushing OR "gushing blood" OR cramp OR cramping OR emergency OR killed OR Poison OR pain OR murder OR "soaking OR "soaking pads" OR clots OR "passing clots"" OR death OR blood OR bleeding OR abandon OR abandoned OR abandoning OR drugged OR "poor baby" OR "hot chocolate" OR "barely eating" OR "high impact" OR expel OR expelling OR faked OR "lost a whole pint" OR "bleeding out" OR alcohol OR "pile of blood" OR "sitting here in a pile" OR "heart rate" OR "history of hemorrhaging" OR "likely-deceased embryo" OR "code red" OR OR "fucking code red" dizzy OR tampons OR PTSD OR "cause of death" OR "unhealthy pregnancy" OR "not taking prescribed medication" OR "no way to say" OR spotting OR "stomach cramps"
People	"Jana Pinson" OR Coop OR Chris OR Christopher OR Coopriider OR obstetrician OR melissa OR madrigal OR "Ami Amoroso" OR Voldemort OR "he who must not be named" OR trophy OR "The Shittiest Human" OR "failure of a man" OR "orange pubes" OR "ginger pubes" OR "baby killer" OR asshole OR "stupid fucking asshole"
Comments concerning this lawsuit with third parties	Lawsuit OR Answer OR "suing me" OR "I may lose" OR discovery OR "want my phone" OR "want my computer" OR "won't produce my computer without a court order" OR bogus OR "how will I pay"

Request No. 2 Produce all DEVICES for extraction of all COMMUNICATIONS in native format between YOU and YVONNE YAKOPOVICH Cell phone number 7 [REDACTED] from 4/1/2025 to the present.

Request No. 3 Produce all DEVICES for extraction of all COMMUNICATIONS in native format between YOU and AMI AMOROSO from 1/1/2025 to the present.

Request No. 4 Produce all DEVICES for extraction of all COMMUNICATIONS in native format between YOU and ANNA ZIARO from 1/1/2025 to the present.

Request No. 5 Produce all DEVICES for extraction of all COMMUNICATIONS in native format between YOU and JANA PINSON from 1/1/2025 to the present.

Request No. 6 Produce all DEVICES for extraction of all COMMUNICATIONS and in native format between YOU and THE PREGNANCY CENTER OF COASTAL BEND from 1/1/2025 to the present.

Request No. 7 Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and MARK LEE DICKSON from 1/1/2025 to the present.

Request No. 8 Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and KRISTY LOESEL (814) 823-4615 from 1/1/2025 to the present.

Request No. 9 Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and ROMY SATERY FROM 1/1/2025 to the present.

Request No. 10 Produce all DEVICES for retrieval and extraction of all COMMUNICATIONS between YOU and any person between 5:00 am on 4/4/2025 and midnight 4/7/2025.

Request No. 11 Produce all DEVICES for retrieval and extraction of all internet searches related to pregnancy, abortion, Texas abortion law, prosecution, poisoning, toxicology, abortion medication, Chris Coopriider (including his job, his hours, his status with the Marines, his property, his rentals, his activities, and his location), "taste of misoprostol," "misoprostol dissolve," "alcohol cover the flavor," "dose Xanax"

Request No. 12 Produce all DEVICES for retrieval and extraction of your location data for 4/1/2025 to 4/7/2025.

Request No. 13 Produce all DEVICES for retrieval and extraction of audio recordings of YOU having sex with Defendant.

Request No. 14 Produce all DEVICES YOU used to record Defendant on April 5 and April 6, 2025 for extraction of all audio and video recordings you made on April 5 and April 6, 2025.

Request No. 15 Produce all DEVICES for an analysis of data deletion, data loss, and data movement since 1/1/2025.

Request No. 16 Produce all DEVICES for an analysis of all menstruation, fertility and/or sexual activity tracking apps for the dates 1/1/2025 to 4/1/2025.

Request No. 17 Produce all DEVICES for an analysis of a work out tracking apps for the dates 1/1/2025 to 4/5/2025.

Request No. 18 Produce all DEVICES for retrieval and extraction of all voice memos, notes, calendar events, and reminders created between 1/1/2025 and 5/1/2025.

May 13, 2026

Respectfully submitted,

BETH KLEIN, P.C.

By: /s/ Beth Klein

Beth Klein

Colorado Bar No. 17477

S.D. Tex. I.D. No. 3934133

beth@bethklein.com

350 Market Street, Suite 310

Basalt, Colorado 81621

Telephone: (303) 448-8884

Mikal C. Watts

WATTS LAW FIRM LLP

Texas State Bar No. 20981820

Federal Bar ID # 12419

mikal@wattslp.com

811 Barton Springs #725

Austin, Texas 78704

Telephone: (512) 479-0500

Facsimile: (512) 479-0501

ATTORNEY-IN-CHARGE FOR CHRISTOPHER COOPRIDER

Barry A. Moscowitz

THOMPSON, COE, COUSINS & IRONS, LLP

Texas State Bar No. 24004830

Federal Bar ID No. 31054

bmoscowitz@thompsoncoe.com

700 North Pearl Street, 25th Floor

Dallas, Texas 75201

Telephone: (214) 871-8200

Facsimile: (214) 871-8209

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2026, a copy of the foregoing discovery request was sent via email to all counsel of record.

/s/ Beth Klein
Beth Klein