

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.

**Reply Brief in Support of Plaintiff's Motion To Require Production
Of Communications And Documents Related To The Unauthorized
Access Of Ms. Davis's iPhone**

The Court has already determined that Mr. Coopridier's attorneys violated its order of May 14, 2026, by accessing the contents of Ms. Davis's iPhone. Mr. Coopridier's attorneys must candidly disclose the extent of these violations and assist the Court and Ms. Davis's attorneys in their efforts to determine an appropriate remedy for their misconduct. Nothing in the response filed by Mr. Coopridier's attorneys justifies their non-responsiveness to Mr. Mitchell's repeated e-mail inquiries or the concealment of their communications with Mr. Vasiliou.

**I. MS. DAVIS NEED NOT FILE A MOTION TO COMPEL BECAUSE SHE
IS NOT SEEKING TO COMPEL DISCOVERY FROM MR. COOPRIDIER**

Mr. Coopridier's attorneys claim that Ms. Davis must first serve a formal discovery request for their communications with Mr. Vasiliou and the data that they obtained from Ms. Davis's iPhone. They also claim that Ms. Davis cannot ask this Court for relief until after Mr. Coopridier objects to these hypothetical discovery requests and Ms. Davis files a motion to compel discovery under Rule 37(a). *See* Response, ECF No. 93, at 1–2; *id.* at 18.

Ms. Davis, however, is not seeking discovery from Mr. Coopridier on these matters. She is asking Mr. Coopridier's attorneys to disclose the extent to which they violated this Court's order of May 14, 2026, so that Ms. Davis can seek and the Court can impose appropriate remedies for their misconduct. These are not issues that have any bearing on the truth of Ms. Davis's claims or Mr. Coopridier's defenses, so they are not appropriate matters for discovery under Rule 26(b). Ms. Davis is instead requesting information that will reveal the extent to which Mr. Coopridier's attorneys violated the order of this Court, which prohibited them and Mr. Vasiliou from accessing the contents of Ms. Davis's iPhone without court authorization.

II. MR. VASILIOU AND MR. COOPRIDIER'S ATTORNEYS HAVE IGNORED MR. MITCHELL'S REPEATED E-MAILS REQUESTING THEM TO TURN OVER THEIR COMMUNICATIONS AND DATA OBTAINED FROM MS. DAVIS'S IPHONE

Neither Mr. Vasiliou nor Mr. Coopridier's attorneys have responded to any of the e-mails that Mr. Mitchell sent requesting their communications about Ms. Davis's iPhone and the data that they improperly obtained from Ms. Davis's iPhone.

Each of Mr. Mitchell's repeated requests for these data and communications, which appear in Exhibits 1–11 to Ms. Davis's motion (ECF No. 84), was met with radio silence from Mr. Vasiliou and Mr. Coopridier's legal team. Mr. Coopridier has not attached any e-mails showing that his attorneys acknowledged or answered any of Mr. Mitchell's requests.

Mr. Coopridier is now claiming that his attorneys *did* in fact provide Mr. Mitchell with what they call the “artifacts” obtained from Ms. Davis's iPhone. *See* Response, ECF No. 93, at 2; *id.* at 7–8. Mr. Coopridier refers to two e-mails that Ms. Klein sent to Mr. Mitchell on May 27, 2026, and May 31, 2026. The first of these e-mails was sent the night before Ms. Davis's deposition and says:

Ms. Kerr, Mr. Marroquin and counsel:

Here is the link to the Exhibits 1 – 48 for tomorrow’s deposition.

<https://we.tl/t-6yxcuxBsTFnfAqwZ>

Exhibit 1. Nothing in this e-mail or linked exhibits indicates what Mr. Coopriders attorneys obtained from Ms. Davis’s iPhone in violation of the Court’s order May 14, 2026.

The e-mail that Ms. Klein sent to Mr. Mitchell on May 31, 2026, contains no text at all, only an attached PDF entitled “20260531 3rd Supplemental Disclosures.” Exhibit 2 (e-mail). The attachment, when opened, provides a link to Mr. Coopriders third supplemental disclosures along with an index and privilege log, but it does not claim that these disclosures represent the data that Mr. Coopriders attorneys obtained from Ms. Davis’s iPhone in violation of the Court’s order. Nor does Ms. Klein’s e-mail of May 31, 2026, claim to be responding to the previous e-mail requests that Mr. Mitchell sent requesting the disclosure of these data.

When Mr. Mitchell received the e-mail of May 31, 2026, he immediately wrote back to Ms. Klein and asked:

Counsel:

Please identify everything in these supplemental disclosures that you obtained from Ms. Davis’s iPhone or iCloud storage.

Exhibit 4. Ms. Klein replied:

We have never been able to access the iCloud, and you know this.

The screen shots of the change in Ami Amoroso’s name, the period and pregnancy note and the report, Exhibit 40.

Id. Mr. Coopriders attorneys never once told Mr. Mitchell that these four “artifacts” in the third supplemental disclosures represent the entirety of the data that they improperly obtained from Ms. Davis’s iPhone, and they ignored Mr. Mitchell’s repeated

e-mails requesting them to disclose the full extent of their unauthorized access to the contents of Ms. Davis’s iPhone. *See* Mitchell Decl. ¶ 8 (attached as Exhibit 5).¹

Mr. Coopriders’ attorneys now urge the Court to deny Ms. Davis’s motion because they claim to have produced the four “artifacts” in their third supplemental disclosures. *See* Response, ECF No. 93, at 7. That is unacceptable for many reasons.

First. Mr. Coopriders’ attorneys claim that Mr. Vasiliou provided them with evidence of “imminent child abuse” from Ms. Davis’s iPhone. *See* Response, ECF No. 93, at 7. Yet they have not provided this evidence to Mr. Mitchell, and nothing that Mr. Coopriders produced in his third supplemental disclosures has anything to do with child abuse. *See* Mitchell Decl. ¶ 9 (attached as Exhibit 5). The Court should order Mr. Coopriders’ attorneys to immediately produce this supposed evidence of “imminent child abuse” that they improperly obtained from Ms. Davis’s iPhone.

Second. Mr. Mitchell has repeatedly asked Mr. Coopriders’ attorneys to turn over their communications with Mr. Vasiliou about Ms. Davis’s iPhone. Yet Mr. Coopriders’ attorneys have steadfastly refused to produce those communications or even acknowledge Mr. Mitchell’s requests for those communications. Nor have they presented any argument in their brief for why their communications with Mr. Vasiliou should remain secret. The Court should order both Mr. Vasiliou and Mr. Coopriders’ attorneys to immediately produce all of their communications relating to Ms. Davis’s iPhone and devices.

Third. The Court should not accept the bald assertion that Mr. Coopriders’ attorneys received only the “four artifacts” plus “imminent child abuse information” from Mr. Vasiliou. *See* Response, ECF No. 93, at 7 (“With the exception of four

1. Mr. Coopriders’ attorneys falsely claim that Mr. Mitchell “did not see fit to look at or read the Artifacts that were provided to him in May or prior to the filing of the Motion.” Response, ECF No. 93, at 2. Mr. Mitchell reviewed all of the documents provided in the third supplemental disclosures immediately upon receiving them. *See* Mitchell Decl. ¶ 8 (attached as Exhibit 5).

artifacts which were provided to COOPRIDER who provided them to Plaintiff on May 27 and 31, 2026 and imminent child abuse information, nothing has been provided to the Defense.”). This statement is unsupported by affidavit or declaration, and Mr. Vasiliou has not independently confirmed this account. Mr. Coopriders’ attorneys have shown that they cannot be trusted, as they accessed data from Ms. Davis’s iPhone in violation of this Court’s order of May 14, 2026. It is also hard to believe that Mr. Vasiliou, who has extracted *all* of the information requested in Mr. Coopriders’ ESI discovery requests of May 13, 2026,² would turn over only a limited subset of that data to Mr. Coopriders’ attorneys—especially when Mr. Coopriders’ attorneys continue to defend their belief that the Court’s order of May 14, 2026, allowed them to immediately access the data sought in their ESI discovery requests. *See* Response, ECF No. 93, at 6. Mr. Coopriders’ attorneys have not explained why Mr. Vasiliou would provide them with only the four “artifacts” plus the supposed evidence of “imminent child abuse,” while withholding everything else. Mr. Coopriders’ attorneys believed that they were entitled to access *everything* described in the ESI discovery requests, so why would they instruct Mr. Vasiliou to turn over only some and not all of the extracted material? At the very least, the Court must obtain and examine the relevant communications between Mr. Vasiliou and Mr. Coopriders’ attorneys before accepting the truth of this assertion.

Fourth. Ms. Klein asked many questions at Ms. Davis’s deposition that appear to be based on data and information that Mr. Coopriders’ lawyers illegally obtained from Ms. Davis’s cell phone. *See* Motion, ECF No. 84, at 13–16. Mr. Coopriders’ brief does not come close to proving that each of these questions was based on materials obtained apart from Ms. Davis’s iPhone. *See* Response, ECF No. 93, at 9–15. The brief asserts that some of the questions were inspired by information provided by

2. *See* Response, ECF No. 93, at 7 (“Mr. Vasiliou performed the extraction with the searches in the ESI request to Plaintiff.”).

Devin Davis and Jeffrey Sparks, as well as documents that Ms. Davis previously produced in discovery. *See id.* But Coopriders never denies that content improperly obtained from Ms. Davis’s iPhone might have provided additional source material for these questions. Both the Court and Ms. Davis need to know the full extent to which Mr. Coopriders’s attorneys accessed the data in Ms. Davis’s iPhone, as well as the full extent of their communications with Mr. Vasiliou.

III. THE COURT CANNOT ASSESS WHETHER MS. DAVIS SUFFERED PREJUDICE FROM THE UNAUTHORIZED ACCESS TO HER IPHONE UNTIL THE FULL EXTENT OF THE UNAUTHORIZED ACCESS IS REVEALED

Mr. Coopriders contends that Ms. Davis suffered no prejudice from his attorneys’ violation of the Court’s order and insists that the improperly obtained information would eventually have been revealed in discovery. *See* Response, ECF No. 93, at 3–8. But that is for the Court to determine *after* Mr. Coopriders’s attorneys reveal the entirety of their communications with Mr. Vasiliou and the full extent of their unauthorized access to Ms. Davis’s iPhone.

More importantly, the issue of “prejudice” has no relevance to this motion. Ms. Davis is not yet requesting sanctions on Mr. Coopriders’s attorneys. She is asking only that Mr. Vasiliou and Mr. Coopriders’s attorneys disclose their communications related to Ms. Davis’s iPhone, as well as the extent to which they accessed data on her phone in violation of the Court’s order of May 14, 2026. Any determination on the issue of prejudice is premature, and it has no bearing on whether the requested communications and data should be turned over to Mr. Mitchell.

Finally, Mr. Coopriders’s claim that the supposed evidence of “imminent child abuse” would have been discovered through normal discovery channels is patently false. Evidence of child abuse would not be discoverable under Rule 26(b) because it has no relevance to Ms. Davis’s claim that Mr. Coopriders poisoned her with misoprostol, and it has no relevance to Mr. Coopriders’s defense that Ms. Davis suffered a

natural miscarriage. Ms. Davis’s attorney would have objected to any discovery request seeking material along these lines, and Mr. Coopriders’ attorneys would not have been able to show that evidence of child abuse qualifies as discoverable material under the standard in Rule 26(b). Ms. Davis has also objected to the ESI discovery requests that Mr. Coopriders served on May 13, 2026, and Mr. Coopriders has no basis for assuming that this Court would overrule all of her objections and order the production of the requested data.

IV. THE REMAINING CONTENTIONS IN MR. COOPRIDERS’ BRIEF HAVE NO RELEVANCE TO MS. DAVIS’S MOTION

Mr. Coopriders’ brief attacks Ms. Davis and her attorney on issues that have no relevance to this motion. Ms. Davis is asking this Court to require Mr. Coopriders’ attorneys to turn over their communications with Mr. Vasiliou, as well as the data and contents that they improperly extracted and obtained from Ms. Davis’s cell phone. The parties’ negotiations over Array’s appointment have nothing to do with whether Mr. Coopriders’ attorneys should be allowed to conceal their communications with Mr. Vasiliou or the extent of their unauthorized access to the contents of Ms. Davis’s iPhone. *See* Response, ECF No. 93, at 2. Neither do the objections that Ms. Davis raised to Mr. Coopriders’ ESI discovery requests. *See id.* (complaining that Ms. Davis “served baseless objections to the ESI Discovery requests that must now be resolved by the Court.”).

The claim that Mr. Mitchell “believed” that the Court’s order of May 14, 2026, compelled Mr. Vasiliou to extract the data requested in the ESI discovery requests is false and irrelevant. *See* Response, ECF No. 93, at 4 (“Mr. Mitchell’s email dated May 28 to Mr. Vasiliou shows that Plaintiff believed that the extraction had been ordered.” (emphasis removed)); *but see* Mitchell Decl. ¶ 7 (attached as Exhibit 5) (“I did not and never have interpreted the Court’s order of May 14, 2026, as authorizing or requiring Mr. Vasiliou to extract any content from my client’s iPhone, and I did not

express that belief in my e-mail to Mr. Vasiliou on May 28, 2026.”). The Court has already found that Mr. Vasiliou violated its order of May 14, 2026, by extracting the data, and Mr. Coopriders’ attorneys violated the Court’s order if they instructed Mr. Vasiliou to conduct these extractions. The issue in this motion is not whether Mr. Vasiliou and Mr. Coopriders’ attorneys violated the Court’s order—the Court has already concluded that they did—but whether Mr. Vasiliou and Mr. Coopriders’ attorneys should turn over their communications about Ms. Davis’s iPhone and the data that they obtained from her iPhone in violation of the Court’s order.

V. THE COURT SHOULD ORDER MR. COOPRIDER’S LAWYERS TO PAY THE ATTORNEYS’ FEES INCURRED IN PREPARING AND ARGUING THIS MOTION

Mr. Coopriders’ lawyers do not attempt to explain or justify their repeated refusals to answer or acknowledge Mr. Mitchell’s e-mails requesting their communications with Mr. Vasiliou. And they should have immediately disclosed to the Court and to Ms. Davis the extent of their unauthorized access to Ms. Davis’s iPhone as soon as the Court declared that they had violated its order by obtaining these materials. Ms. Davis’s should not have had to seek the Court’s involvement to obtain these materials, and a lawyer of integrity would have produced these requested documents and communications immediately upon request.

CONCLUSION

The Court should order Mr. Vasiliou and Mr. Coopriders’ attorneys to turn over all of their communications relating to Ms. Davis’s iPhone or other devices or any data on those devices. The Court should also order Mr. Vasiliou and Mr. Coopriders’ attorneys to disclose to Mr. Mitchell all material from Ms. Davis’s iPhone or other devices that they have viewed, searched, accessed, or obtained, and to produce all documents, data, content, analyses, reports, or records that they have possessed or prepared that relate in any way to the information on Ms. Davis’s iPhone or other

devices. The Court should also order Mr. Coopriders attorneys to pay attorneys' fees for the time that Ms. Davis's lawyers spent preparing and arguing this motion.

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Attorney-in-Charge
Texas Bar No. 24075463
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Mitchell Law PLLC
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(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

Dated: July 9, 2026

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on July 9, 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: Beth Klein beth@bethklein.com
Subject: - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Cooprider, et al. EXHIBIT LINK
Date: May 27, 2026 at 5:14 PM
To: David Marroquin depovideodirect@gmail.com, Jonathan Mitchell jonathan@mitchell.law, Moscowitz, Barry bmoscowitz@thompsoncoe.com, Joshua Tolin joshua@veritasmilitarylaw.com
Cc: Sylvia Kerr skerrcsr@yahoo.com

Ms. Kerr, Mr. Marroquin and counsel:

Here is the link to the Exhibits 1 – 48 for tomorrow's deposition.

<https://we.tl/t-6yxcuxBsTFnfAqwZ>

Beth Klein
Phone 303-448-8884
beth@bethklein.com
Fax 720-307-2816
[Documentary Website](#)
350 Market Street, Suite 310 Basalt CO 81621

BETH KLEIN



From: David Marroquin <depovideodirect@gmail.com>
Sent: Wednesday, May 27, 2026 2:54 PM
To: Waco Calendar <wacocalendar@crcnational.com>
Cc: Beth Klein <beth@bethklein.com>; Sylvia Kerr <skerrcsr@yahoo.com> <skerrcsr@yahoo.com>
Subject: Re: **PLEASE CONFIRM** Confirmation - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Cooprider, et al.

Received. Thank you

AbkDavid Marroquin
361.434.2469

On Wed, May 27, 2026 at 3:52 PM Waco Calendar <wacocalendar@crcnational.com> wrote:

Hi Beth,

I have copied them on this email.

Thank you,



ASSOCIATED COURT REPORTERS

Alexandria Wiley – Calendar Specialist
425 Austin Avenue, Suite 1206
Waco, Texas 76701

Waco, Texas 76701
(254) 753-3330
(800) 340-5881
scheduling@acrtx.com
www.acrtx.com

From: Beth Klein <beth@bethklein.com>
Sent: Wednesday, May 27, 2026 3:45 PM
To: Waco Calendar <wacocalendar@crcnational.com>
Subject: RE: **PLEASE CONFIRM** Confirmation - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Coopriider, et al.

How do I get the exhibits to the reporter and videographer?

Beth Klein
Phone 303-448-8884
beth@bethklein.com
Fax 720-307-2816
[Documentary Website](#)
[350 Market Street, Suite 310 Basalt CO 81621](#)



From: Beth Klein <beth@bethklein.com>
Sent: Tuesday, May 26, 2026 9:38 AM
To: Waco Calendar <wacocalendar@crcnational.com>
Subject: Re: **PLEASE CONFIRM** Confirmation - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Coopriider, et al.

Yes

Beth Klein
Mobile response

From: Waco Calendar <wacocalendar@crcnational.com>
Sent: Tuesday, May 26, 2026 9:20:58 AM
To: Beth Klein <beth@bethklein.com>
Subject: RE: **PLEASE CONFIRM** Confirmation - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Coopriider, et al.

Just for confirmation, you would like to add zoom?





ASSOCIATED COURT REPORTERS

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From: Beth Klein <beth@bethklein.com>
Sent: Tuesday, May 26, 2026 9:50 AM
To: Waco Calendar <wacocalendar@crcnational.com>
Subject: Re: **PLEASE CONFIRM** Confirmation - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Coopriider, et al.

Confirmed.

We also need a link for a lawyer who will sign in from Hawaii

Because the despondent is pregnant with twins, this deposition may go into a second day.

Thank you

Beth Klein

Mobile response

From: Waco Calendar <wacocalendar@crcnational.com>
Sent: Tuesday, May 26, 2026 8:42:46 AM
To: Beth Klein <beth@bethklein.com>
Subject: **PLEASE CONFIRM** Confirmation - 5/28/2026 @ 9:00AM - Videotaped Depo: Liana Davis - Davis vs. Coopriider, et al.



Confirmation

ASSOCIATED COURT REPORTERS

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www.acr.tx.com

Job No.	196617	Scheduled Date	2/5/2026
ATTN	Beth Klein	Attorney	Beth Klein

Firm	Beth Klein, P.C. 350 Market Street, Suite 310 Basalt, CO 81621 303-448-8884
-------------	---

This email is being sent as confirmation of the following scheduled assignment.

Style of Case	Davis vs. Coopriider, et al.
Witness(es)	Liana Davis

Job Date	5/28/2026	Time	9:00AM Central Standard Time
-----------------	------------------	-------------	-------------------------------------

Location	Hartline Barger, LLP 800 North Shoreline Boulevard, Suite 2000 North Tower Corpus Christi, TX 78401 361-866-8000
Services	VIDEO + REALTIME
Remarks	Late Cancellation Fee may apply if a job is cancelled after the close of business one business day prior to scheduled date. If we have scheduled an interpreter, Late Cancellation Fee may apply if a job is cancelled less than 24 hours in advance per interpreting services industry standards.

Alexandria Wiley - Calendar Specialist
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From: Beth Klein beth@bethklein.com 

Subject: 3rd Supplemental Disclosures

Date: May 31, 2026 at 11:54 AM

To: Jonathan Mitchell jonathan@mitchell.law

Cc: Mikal Watts mikal@wattslp.com, Moscowitz, Barry bmoscowitz@thompsoncoe.com, Hamby, Oliver ohamby@thompsoncoe.com, Jimenez, Victoria vjimenez@thompsoncoe.com, George Vasiliou george.digitals@gmail.com

BK

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350 Market Street, Suite 310 Basalt CO 81621

----- BETH  KLEIN -----

**20260531 3rd
Supplemental...**
183 KB



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

Liana Davis,

Plaintiff,

v.

Christopher Coopriders,
Aid Access GmbH, &
Rebecca Gomperts,

Defendants.

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Case No. 2:25-cv-220

THIRD SUPPLEMENTAL DISCLOSURE OF DOCUMENTS AND THINGS

Defendant Christopher Coopriders (“COOPRIDERS”), through his attorneys, provides the following 3rd supplemental disclosures pursuant to Federal Rules of Civil Procedure 26(a)(1).

Fed. R. Civ. P. 26(a)(1)(ii)—A copy—or description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment. See Exhibit A. Document Link.

<https://we.tl/t-BUsCCX1oQHxqxXOH>

/s/ Beth Klein

Beth Klein
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ATTORNEY-IN-CHARGE FOR
CHRISTOPHER COOPRIDER

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2026, a copy of the foregoing pleading was served through email to all counsel of record.

/s/ Beth Klein
Beth Klein

EXHIBIT A – GLOBAL INDEX OF DISCLOSED DOCUMENTS AND PRIVILEGE LOG

Date Produced	Bates No.	Description
9/9/2025 Initial Discl	CR000001	February 3, 2025 recording of DAVIS's request of COOPRIDER that he clean his phone. (produced natively)
9/9/2025 Initial Discl	CR000001A	Transcript to CR0000001
9/9/2025 Initial Discl	CR000002	Recording of March 21, 2025 Ultrasound. (produced natively)
9/9/2025 Initial Discl	CR000002B	Transcript of Ultrasound Recording
9/9/2025 Initial Discl	CR000003	Ultrasound Analysis (produced natively)
9/9/2025 Initial Discl	CR000003C	Transcript of Ultrasound Analysis
9/9/2025 Initial Discl	CR000004	Audio Recording dated April 5, 2025, sent by DAVIS to COOPRIDER (produced natively)
9/9/2025 Initial Discl	CR000005	Video of DAVIS March 5, 2025 and Transcript of that Video (video produced natively)
9/9/2025 Initial Discl	CR000006	788 Screen Shots
9/9/2025 Initial Discl	CR000033	Text from DAVIS to COOPRIDER, March 21, 2025
9/9/2025 Initial Discl	CR000034	Screen Shots of texts from DAVIS to COOPRIDER, sent in prior to Feb. 25, 2025, and re-sent on March 21, 2025
9/9/2025 Initial Discl	CR000034	Screen Shots of texts on February 24, 2025
9/9/2025 Initial Discl	CR000036	Text from DAVIS to COOPRIDER, dated February 24, 2025
9/9/2025 Initial Discl	CR000037	Text from DAVIS to COOPRIDER, dated April 4, 2025
9/9/2025 Initial Discl	CR000046	Text from DAVIS to COOPRIDER, April 4, 2025
9/9/2025 Initial Discl	CR000058	Text from DAVIS to COOPRIDER, March 22, 2025
9/9/2025 Initial Discl	CR000065	Text from DAVIS to COOPRIDER, March 22, 2025
9/9/2025 Initial Discl	CR000078	Text from DAVIS to COOPRIDER dated March 22, 2025
9/9/2025 Initial Discl	CR000132	Text Message from DAVIS to COOPRIDER dated March 24, 2025
9/9/2025 Initial Discl	CR000135	Text from DAVIS to COOPRIDER dated March 24, 2025
9/9/2025 Initial Discl	CR000187	Text from DAVIS to COOPRIDER dated March 25, 20

9/9/2025 Initial Discl	CR000192	Text from DAVIS to COOPRIDER, March 25, 2025
9/9/2025 Initial Discl	CR000194	Screen shot dated March 25, 2025
9/9/2025 Initial Discl	CR000199	Text from DAVIS to COOPRIDER, March 25, 2025
9/9/2025 Initial Discl	CR000200	Text from DAVIS to COOPRIDER, March 25, 2025
9/9/2025 Initial Discl	CR000201	Text from DAVIS to COOPRIDER, March 25, 2025
9/9/2025 Initial Discl	CR000203	Text from DAVIS to COOPRIDER, March 25, 2025
9/9/2025 Initial Discl	CR000235.5	Screen Shot
9/9/2025 Initial Discl	CR000249	Text from DAVIS to COOPRIDER, forwarding DAVIS texts with “Nick,” March 26, 2025, 12:21:28 PM
9/9/2025 Initial Discl	CR000274.5	Screen Shot
9/9/2025 Initial Discl	CR000327	Text from DAVIS to COOPRIDER, March 26, 2025
9/9/2025 Initial Discl	CR000328	Text from DAVIS to COOPRIDERE dated March 26, 2025
9/9/2025 Initial Discl	CR000405	Text from DAVIS to COOPRIDER dated March 28, 2025
9/9/2025 Initial Discl	CR000416	Texts from DAVIS to COOPRIDER, March 29, 2025
9/9/2025 Initial Discl	CR000537	Excerpt of Text from DAVIS to COOPRIDER, March 31, 2025
9/9/2025 Initial Discl	CR000680	Text from DAVIS to COOPRIDER, April 4, 202
9/9/2025 Initial Discl	CR000683	Text Messages from DAVIS to COOPRIDER, dated April 4, 2025
9/9/2025 Initial Discl	CR000708	Screenshot from Text of DAVIS to COOPRIDER, April 4, 2025
9/9/2025 Initial Discl	CR000752	Excerpts of Text Messages from DAVIS to COOPRIDER from nights of April 6-7, 2025
9/9/2025 Initial Discl	CR000778	Text from DAVIS to COOPRIDER dated April 7, 2025
9/9/2025 Initial Discl	CR000784	Text from DAVIS to COOPRIDER dated April 7, 2025
9/9/2025 Initial Discl	CR000794	Video of DAVIS approaching Neighbor’s Door on two occasions. April 5, 2025 (produced natively)
9/9/2025 Initial Discl	CR000795	2024-FAM-3927-A Case Summary
9/9/2025 Initial Discl	CR000796	Audio File #18 and Transcript (audio produced natively)

9/9/2025 Initial Discl	CR000799	ER Motion for TRO04112025
9/9/2025 Initial Discl	CR000804	Amicus Affidavit In Support Extraordinay Relief.
9/9/2025 Initial Discl	CR000810	Order Granting TRO and Setting TO Signed
9/9/2025 Initial Discl	CR000814	Agreed Order Signed 012025_AND IN THE INTEREST OF CIEL CELESTE DAVIS, CALI SUMMER
9/9/2025 Initial Discl	CR000824	Recording of Jackie O. taking DAVIS to ER (produced natively)
9/9/2025 Initial Discl	CR000825	NAVLIR 4/6/2025
9/9/2025 Initial Discl	CR000826	FlightGrade 4/6/2025
9/9/2025 Initial Discl	CR000828	Trophy Pics
9/9/2025 Initial Discl	CR000832	Obsession Files
9/9/2025 Initial Discl	CR000841	Audio #1 and transcript (produced natively)
9/9/2025 Initial Discl	CR000843	Audio #2 and transcript (produced natively)
9/9/2025 Initial Discl	CR000844	Audio #3 and transcript (produced natively)
9/9/2025 Initial Discl	CR000847	Audio Recording, March 25, 2025 (produced natively)
9/9/2025 Initial Discl	CR000853	Audio #4 and transcript (produced natively)
9/9/2025 Initial Discl	CR000855	Audio #5 and transcript (produced natively)
9/9/2025 Initial Discl	CR000856	Audio #6 and transcript (produced natively)
9/9/2025 Initial Discl	CR000865	Audio #7 and transcript (produced natively)
9/9/2025 Initial Discl	CR000873	Audio #8 and transcript (produced natively)
9/9/2025 Initial Discl	CR000885	Audio #9 and transcript (produced natively)
9/9/2025 Initial Discl	CR000891	Audio #10 and transcript (produced natively)
9/9/2025 Initial Discl	CR000905	Audio #12 and transcript (produced natively)
9/9/2025 Initial Discl	CR000916	Audio #13 and transcript (produced natively)
9/9/2025 Initial Discl	CR000932	Audio #14 and transcript (produced natively)

9/9/2025 Initial Discl	CR000951	Audio #15 and transcript (produced natively)
9/9/2025 Initial Discl	CR000966	Audio #16 and transcript (produced natively)
9/9/2025 Initial Discl	CR000972 - 999	Audio #17 and transcript (produced natively)
1st Supp Discl	CR001000 - 1014	Alex Simak Texts
1st Supp Discl	CR001015 - 1061	Jackie Samuelson Texts
1st Supp Discl	CR001062 - 1582	Cooprider's texts from Jan 1 to April 30
1st Supp Discl	CR001583 - 1713	Dan Coopriders Texts
PRIVILEGE LOG	CR001713 - 1774	Attorney Client Privilege Communications and Work Product After Attorney Retention
1st Supp Discl	CR001775 - 1783	purchase and shipment of the medicine
1st Supp Discl	CR001784	Chris's VIN doc for his truck.
1st Supp Discl	CR001785 - 1904	Chris's WhatsApp Chat with Jackie Samuelson
1st Supp Discl	CR001905 - 1918	Insurance Declaration Page
1st Supp Discl	CR001919 - 1922	Reservation of Rights Progressive
1st Supp Discl	CR001923 - 1933	Any Lab Text Now Response to Subpoena
1st Supp Discl	CR001934 - 2038	Madrigal's Response to Subpoena
1st Supp Discl	CR002039 - 2105	Open Records Requests (Redactions from Agency)
1st Supp Discl	CR002106	Dan Coopriders Text
1st Supp Discl	CR002107 - 3006	Samuelson Response to Subpoena Messages with Liana 9 12 2025
1st Supp Discl	CR003007 - 3849	Devin Davis Response to Subpoena Liana Davis Text Messages with Devin Davis
1st Supp Discl	CR003850	Samuelson Response to Subpoena Video JS Return Home from bringing LD to hospital (produced natively)
1st Supp Discl	CR003851	Samuelson Response to Subpoena LD initial approach to door to request ride to hospital (produced natively)
1st Supp Discl	CR003852	Samuelson Response to Subpoena LD second approach to door and JS exiting home to drive to hospital (produced natively)
1st Supp Discl	CR003853	Samuelson Response to Subpoena LD visit to home to deliver birthday gift to children a few days after (produced natively)

1st Supp Discl	CR003854	Samuelson Response to Subpoena Personal Recording from JS device of drive to hospital with LD (produced natively)
1st Supp Discl	CR003855 - 3911	Devin Davis Response to Subpoena Whats App
1st Supp Discl	CR003912	Devin Davis Response to Subpoena Don Melrose
1st Supp Discl	CR003913	Devin Davis Response to Subpoena AUD-20250330-WA0000
1st Supp Discl	CR003914	Devin Davis Response to Subpoena IMG-20250401-WA0000
1st Supp Discl	CR003915	Devin Davis Response to Subpoena IMG-20250403-WA0000
1st Supp Discl	CR003916	Devin Davis Response to SubpoenaIMG-20250403-WA0001
1st Supp Discl	CR003917	Devin Davis Response to Subpoena IMG-20250404-WA0000
1st Supp Discl	CR003918	Devin Davis Response to Subpoena IMG-20250411-WA0000
1st Supp Discl	CR003919	Devin Davis Response to Subpoena IMG-20250414-WA0000
1st Supp Discl	CR003920	Devin Davis Response to Subpoena IMG-20250419-WA0000
1st Supp Discl	CR003921	Devin Davis Response to Subpoena IMG-20250424-WA0000
1st Supp Discl	CR003922	Devin Davis Response to Subpoena IMG-20250501-WA0001
1st Supp Discl	CR003923	Devin Davis Response to Subpoena IMG-20250519-WA0000
1st Supp Discl	CR003924	Devin Davis Response to Subpoena IMG-20250519-WA0002
1st Supp Discl	CR003925	Devin Davis Response to Subpoena IMG-20250519-WA0003
1st Supp Discl	CR003926	Devin Davis Response to Subpoena IMG-20250519-WA0004
1st Supp Discl	CR003927	Devin Davis Response to Subpoena IMG-20250519-WA0005
1st Supp Discl	CR003928	Devin Davis Response to Subpoena IMG-20250519-WA0006
1st Supp Discl	CR003929	Devin Davis Response to Subpoena IMG-20250523-WA0000
1st Supp Discl	CR003930	Devin Davis Response to Subpoena IMG-20250525-WA0000
1st Supp Discl	CR003931	Devin Davis Response to Subpoena IMG-20250525-WA0001
1st Supp Discl	CR003932	Devin Davis Response to Subpoena IMG-20250703-WA0000

1st Supp Discl	CR003933	Devin Davis Response to Subpoena IMG-20250727-WA0000
1st Supp Discl	CR003934	Devin Davis Response to Subpoena IMG-20250808-WA0002
1st Supp Discl	CR003935	Devin Davis Response to Subpoena IMG-20250808-WA0003
1st Supp Discl	CR003936	Devin Davis Response to Subpoena IMG-20250901-WA0000
1st Supp Discl	CR003937	Devin Davis Response to Subpoena IMG-20250901-WA0001
1st Supp Discl	CR003938	Devin Davis Response to Subpoena PTT-20250425-WA0000
1st Supp Discl	CR003939	Devin Davis Response to Subpoena PTT-20250523-WA0002
1st Supp Discl	CR003940	Devin Davis Response to Subpoena PTT-20250525-WA0002
1st Supp Discl	CR003941	Devin Davis Response to Subpoena PTT-20250808-WA0000
1st Supp Discl	CR003942	Devin Davis Response to Subpoena VID-20250327-WA0000
1st Supp Discl	CR003943	Devin Davis Response to Subpoena VID-20250501-WA0000
1st Supp Discl	CR003944	Devin Davis Response to Subpoena VID-20250518-WA0000
1st Supp Discl	CR003945	Devin Davis Response to Subpoena VID-20250519-WA0001
1st Supp Discl	CR003946	Devin Davis Response to Subpoena VID-20250523-WA0001
1st Supp Discl	CR003947	News Report that OBGYN believes this was a natural miscarriage https://www.kristv.com/news/local-news/in-your-neighborhood/corpus-christi/trial-date-set-for-woman-who-claims-marine-spiked-her-drink-with-abortion-pills?brid=N1Mf2rKbGdEuKq_OCxma6A
1st Supp Discl	CR003948	Lt Col Grell Communications
1st Supp Discl	CR003949 - 3951	Lt. Col Dunsworth Communications
May 27, 2026 Email		CCPD Investigation
3rd Suppl Disclosures		Screen Shot dated March 25, 2025 Period Conception
3rd Suppl Disclosures		Screen Shot Period
3rd Suppl Disclosures		Prescription Zithromax
3rd Suppl Disclosures		DWQ Any Lab Test Now Records

3rd Suppl Disclosures		DWQ Any Lab Test Now Bills
May 27, 2026 Email		DWQ Corpus Christ Women's Clinic
3rd Suppl Disclosures		Davis Data
3rd Suppl Disclosures		Davis Data
May 27, 2026 Email		Exhibit 40 Report
3rd Suppl Disclosures		Davis IMG 1440
3rd Suppl Disclosures		Davis IMG 1441
3rd Suppl Disclosures		Davis IMG 1442
3rd Suppl Disclosures		Medical Records Summary of Chlamydia Diagnosis and Treatment
3rd Suppl Disclosures		STD Report on Liana Davis to the State of Texas

From: Beth Klein beth@bethklein.com 

Subject: RE: 3rd Supplemental Disclosures

Date: May 31, 2026 at 12:15 PM

To: Jonathan Mitchell jonathan@mitchell.law

Cc: Mikal Watts mikal@wattslp.com, Moscowitz, Barry bmoscowitz@thompsoncoe.com, Hamby, Oliver ohamby@thompsoncoe.com, Jimenez, Victoria vjimenez@thompsoncoe.com, George Vasiliou george.digitals@gmail.com

BK

We have never been able to access the iCloud, and you know this.

The screen shots of the change in Ami Amoroso's name, the period and pregnancy note and the report, Exhibit 40.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621

----- BETH  KLEIN -----

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Sunday, May 31, 2026 1:01 PM

To: Beth Klein <beth@bethklein.com>

Cc: Mikal Watts <mikal@wattslp.com>; Moscowitz, Barry <bmoscowitz@thompsoncoe.com>; Hamby, Oliver <ohamby@thompsoncoe.com>; Jimenez, Victoria <vjimenez@thompsoncoe.com>; George Vasiliou <george.digitals@gmail.com>

Subject: Re: 3rd Supplemental Disclosures

Counsel:

Please identify everything in these supplemental disclosures that you obtained from Ms. Davis's iPhone or iCloud storage.

—Jonathan

On May 31, 2026, at 11:54 AM, Beth Klein <beth@bethklein.com> wrote:

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>

<20260531 3rd Supplemental Disclosures.pdf>

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papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-00220

**Christopher Coopridier; 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 reply brief for the plaintiff's motion to require production of communications and documents related to the unauthorized access of her iPhone

4. The documents attached as Exhibits 1 and 2 to this reply brief are authentic copies of e-mails that I received from attorney Beth Klein on May 27, 2026, and May 31, 2026.

5. The document attached as Exhibit 3 to this reply brief is an authentic copy of the attachment to Ms. Klein's e-mail of May 31, 2026, entitled "20260531 3rd Supplemental Disclosures."

6. The document attached as Exhibit 4 to this reply brief is an authentic copy of another e-mail that I received from Ms. Klein on May 31, 2026.

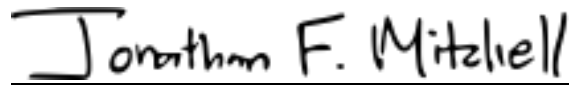
7. Mr. Coopriders attorneys falsely claim that I “believed” that the Courts order of May 14, 2026, required Mr. Vasiliou to extract the data requested in the ESI discovery requests. Response, ECF No. 93, at 4. I did not and never have interpreted the Courts order of May 14, 2026, as authorizing or requiring Mr. Vasiliou to extract any content from my clients iPhone, and I did not express that belief in my e-mail to Mr. Vasiliou on May 28, 2026.

8. Mr. Coopriders attorneys falsely claim that I “did not see fit to look at or read the Artifacts that were provided to him in May or prior to the filing of the Motion.” Response, ECF No. 93, at 2. I reviewed all of the documents provided in the third supplemental disclosures immediately upon receiving them. Mr. Coopriders attorneys never once told me that the four so-called “artifacts” in their third supplemental disclosures represent the entirety of the data that they improperly obtained from Ms. Davis’s iPhone, and they ignored my repeated e-mails requesting them to disclose the full extent of their unauthorized access to the content of Ms. Davis’s iPhone.

9. Nothing that Mr. Coopriders produced in his third supplemental disclosures on May 31, 2026, has anything to do with child abuse.

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

Dated: July 9, 2026


JONATHAN F. MITCHELL