

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

**REPLY BRIEF IN SUPPORT OF NONPARTY MARY ANNA
ZIARKO'S MOTION TO QUASH SUBPOENA**

In determining whether this subpoena unduly burdens Ms. Ziarko, the Court must “balance the interests served by demanding compliance with the subpoena against the interests furthered by quashing it.” *Positive Black Talk Inc. v. Cash Money Records, Inc.*, 394 F.3d 357, 377 (5th Cir. 2004) (citation and internal quotation marks omitted)); *see also id.* (“Whether a subpoena subjects a witness to undue burden generally raises a question of the subpoena’s reasonableness, which ‘requires a court to balance the interests served by demanding compliance with the subpoena against the interests furthered by quashing it.’ 9A Charles Alan Wright & Arthur R. Miller, *Federal Practice And Procedure* § 2463 (2d ed. 1995)”). The Fifth Circuit has also held that “[t]his balance of the subpoena’s benefits and burdens calls upon the court to consider whether the information is necessary and unavailable from any other source.” *Id.* (citation and internal quotation marks omitted). The balance of benefits and burdens leans heavily in favor of quashing the subpoena.

I. REQUIRING MS. ZIARKO TO COMPLY WITH THE SUBPOENA WILL PRODUCE FEW IF ANY BENEFITS

A deposition of Ms. Ziarko will produce few if any benefits because the matters that Coopriders’ lawyers want to question Ms. Ziarko about are not in dispute, are outside Ms. Ziarko’s knowledge, or are unimportant.

Coopriders’ lawyers say that they want to question Ms. Ziarko about each of the following issues:

1. Ms. Davis’s physical condition before her trip to the emergency room;¹
2. Ms. Davis’s activities and condition in the months preceding and following April 5–6, 2025;²
3. The location of items in Ms. Davis’s residence in the early morning of April 6, 2026, such as “hot chocolate mugs, medication, medication packaging [and] . . . bloody towels”;³
4. What Ms. Davis said to Ms. Ziarko during their calls shortly after midnight on April 6, 2025, and how she explained her need to go to the emergency room;⁴
5. How and when “the idea of taking an Uber instead of being picked up by Mr. Coopriders first arise”;⁵
6. Whether Ms. Davis “really” sent Ms. Ziarko money in advance to pay for an Uber ride and how much she sent and through what service;⁶
7. The time at which Davis asked Ms. Ziarko for the copy of the Uber receipt attached to her complaint and the reason she provided for needing it.⁷

1. See Response, ECF No. 113, at 1, 3.

2. See Response, ECF No. 113, at 1, 3.

3. Response, ECF No. 113, at 3.

4. See Response, ECF No. 113, at 3.

5. Response, ECF No. 113, at 4.

6. See Response, ECF No. 113, at 4.

7. See Response, ECF No. 113, at 4.

Issue (1): Ms. Davis’s physical condition during the morning of April 6, 2025, is not in dispute. She was hemorrhaging and in the process of losing her unborn child. Coopridier does not deny that Ms. Davis was bleeding when he left her house at 12:12 A.M. on April 6, 2026. *See* Request for Admission No. 38 (“You were aware that Liana Davis was bleeding when you left her house at approximately 12:12 A.M. on April 6, 2025. RESPONSE: ADMIT.”) (attached as Exhibit 1). And it is undisputed that Ms. Davis lost her unborn child shortly after arriving at the emergency room that morning.

Deposing Ms. Ziarko about Ms. Davis’s physical condition on April 6, 2025, will not provide any new or useful information. Indeed, Ms. Ziarko is likely to be unaware of how dire Ms. Davis’s medical situation was on April 6, 2026, because Ms. Davis had concealed the pregnancy and the alleged murder from her elderly mother for the sake of her health and well-being. *See* Davis Dep. Tr., ECF No. 86, at 62:8–24, 63:11–24; *see also id.* at 64:23–25 (“[S]he knows nothing of the pregnancy, Coopridier, the murder, none of it.”). Ms. Ziarko has a highly incomplete picture of the situation given Ms. Davis’s determination to shield her from the truth. So Ms. Ziarko’s deposition testimony will not produce useful or even truthful information about Ms. Davis’s medical condition on the morning of April 6, 2026.

Issue (2): Ms. Ziarko did not even know that Ms. Davis was pregnant with Coopridier’s child. *See id.* So she will not have useful or relevant information about Ms. Davis’s “activities” that predated the alleged murder, as Ms. Davis had concealed the pregnancy from her mom and hid any activities that might alert her mother to the pregnancy. *See* Davis Dep. Tr., ECF No. 86, at 62:8–24, 63:11–24; 64:23–25.

Issue (3): Coopridier’s lawyers want to quiz Ms. Ziarko about the location of the “hot chocolate mugs,” the abortion drugs and their packaging, and the “bloody towels” in Ms. Davis’s house on the morning of April 6, 2025. But it is not apparent how this has any relevance to the parties’ claims or defenses, and Coopridier’s lawyers make

no attempt to explain its relevance. It is undisputed that Davis and Coopriders drank hot chocolate on the night of April 5, 2026,⁸ so testimony about the location of the hot-chocolate mugs adds nothing to the case. It is equally undisputed that Ms. Davis was hemorrhaging in the early morning of April 6, 2026, which caused her to lose her baby when she arrived at the hospital. So how can the location or condition of “bloody towels” have any effect on Ms. Davis’s claim that she was poisoned or Mr. Coopriders’ defense that she miscarried? And Ms. Davis discovered the abortion-inducing drugs *before* she left for the emergency room and brought them with her to the hospital, where she turned them over to the Corpus Christi police. *See* Complaint, ECF No. 1, ¶¶ 69–71. So the drugs were obviously in the house that night, and Ms. Ziarko would not have seen them or noticed their location given that Ms. Davis took them with her to the hospital as soon as Ms. Ziarko arrived at her house.

Issues (4) – (7): These issues have no relevance to Ms. Davis’s claims or Mr. Coopriders’ defenses. It is undisputed that Coopriders failed to pick up Ms. Ziarko after midnight on April 6, 2026, after leaving Ms. Davis’s house. *See* Request for Admission No. 41 (“You never picked up Liana Davis’s mother on April 6, 2025. RESPONSE: ADMIT.”) (attached as Exhibit 1); Request for Admission No. 42 (“You never drove to Liana Davis’s mother’s residence on April 6, 2025. RESPONSE: ADMIT.”) (attached as Exhibit 1). How and when Ms. Davis arranged for Ms. Ziarko to travel to her house by Uber after Mr. Coopriders abandoned them has no bearing on whether Coopriders poisoned Ms. Davis or whether she suffered a natural miscarriage. Coopriders’ lawyers are also determined to find out what exactly Ms. Davis told her mother given that she was trying to conceal the pregnancy and the alleged murder to the sake of her mother’s health and well-being. *See* Davis Dep. Tr., ECF No. 86, at

8. *See* Request for Admission No. 32 (“Alcohol was mixed into the hot chocolate that Liana Davis drank on the evening of April 5, 2025. RESPONSE: ADMIT.”) (attached as Exhibit 1).

62:8–24, 63:11–24; *see also id.* at 64:23–25 (“[S]he knows nothing of the pregnancy, Cooprider, the murder, none of it.”). But they do not explain how this has any relevance to a party’s claim or defense. Whatever Ms. Davis told her mom will not in any way support her claim that she was poisoned, or Mr. Cooprider’s defense that she miscarried.

The benefits of forcing Ms. Ziarko to sit for a deposition are practically nil. And so are the benefits of forcing Ms. Ziarko to produce text messages and communications that can easily be obtained from Ms. Davis’s cell phone. All of the text messages that Ms. Davis exchanged with Ms. Ziarko on April 5–6, 2026, are retrievable from Ms. Davis’s cell phone. *See* Liana Davis Decl. ¶ 6 (attached as Exhibit 2). Their insistence on obtaining these text messages from Ms. Ziarko is nothing short of harassment.

II. THE BURDENS THAT WILL BE IMPOSED ON MS. ZIARKO HEAVILY OUTWEIGH THE BENEFITS OF FORCING COMPLIANCE WITH THE SUBPOENA

Cooprider does not deny that Ms. Ziarko is suffering from any of the medical conditions described in Ms. Davis’s declaration. *See* Liana Davis Decl., ECF No. 109-2, at ¶¶ 4–9. But he attempts to downplay the burdens that would be imposed on Ms. Ziarko by relying on a false declaration submitted by Devin Davis. *See* Response, ECF No. 113, at 4–5; Devin Davis Decl., ECF No. 114.

Devin Davis did not carry out a custody exchange on June 25, 2026, as he falsely asserts in his declaration. *See* Devin Davis Decl., ECF No. 114. at ¶ 4. He had custody of the children for five more days after June 25, 2026, and no exchange of custody occurred on that date. *See* Liana Davis Decl. ¶ 4 (attached as Exhibit 2).

Devin Davis’s claim that Liana Davis placed the “sole care” of their three children with Ms. Ziarko when she was hospitalized on July 15, 2026, is equally false. *See* Devin Davis Decl., ECF No. 114. at ¶ 5 (“On July 15, 2026 approximately two hours

before a scheduled custody exchange, Liana Davis informed me that she had been admitted to the hospital for the delivery of her twins. During her hospitalization, she placed the sole care of our three young children with her mother, Mary Anna Ziarko, who successfully served as their primary caregiver.”). When Ms. Davis was hospitalized and giving birth to her twins, she left her children in the care of no fewer than *three* adults: Marshall Bowling (the father of her twins), Mr. Bowling’s mother, and Ms. Ziarko. *See* Davis Decl. ¶ 5 (attached as Exhibit 2). Mr. Bowling’s father also stopped by the house during this time to assist. *See id.* At no time during this hospitalization did Ms. Davis leave her children in the “sole care” of Ms. Ziarko. *See id.*

Finally, Devin Davis misrepresents the video that Mr. Coopridier submitted to the Court. And Ms. Ziarko’s only appearances on the video show her sitting on a couch holding a newborn infant in her lap while Ms. Davis speaks with her other three children. That does not in any show that Ms. Ziarko can be “entrusted with significant childcare responsibilities,” or that she is capable of “supervising multiple young children and providing care for a newborn infant.” Even the most frail and elderly invalids in a nursing home can sit with a newborn infant on their lap. That does not make them (or Ms. Ziarko) primed to sit for a seven-hour deposition that will reveal devastating information about a murdered grandchild that they previously knew nothing about.

* * *

The burdens imposed on Ms. Ziarko far outweigh the benefits (if any) from forcing an elderly, frail, and disabled woman who knew nothing about the pregnancy or alleged murder to sit for a deposition. The Court should quash the subpoena.

CONCLUSION

Ms. Ziarko's motion to quash the subpoena should be granted.

Respectfully submitted.

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Dated: August 24, 2026

Counsel for Nonparty Mary Anna Ziarko

CERTIFICATE OF SERVICE

I certify that on August 24, 2026, I served this document through CM/ECF upon:

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Case No. 2:25-cv-220

RESPONSES TO REQUESTS FOR ADMISSION

Request for Admission No. 1: You are a citizen of Arizona.

RESPONSE: ADMIT

Request for Admission No. 2: You are the biological father of the unborn child that Liana Davis conceived in early 2025.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny.

Request for Admission No. 3: You wanted Liana Davis to abort the unborn child that she conceived in early 2025.

RESPONSE: Objection. Vague and ambiguous as to the phrase "she conceived in early 2025."

Request for Admission No. 4: You asked Liana Davis to abort the unborn child that she conceived in early 2025.

RESPONSE: : Objection. Vague and ambiguous as to the phrase "she conceived in early 2025." Liana Davis lied to Coopridier that she was pregnant in "early 2025" when she knew that she was not.

Request for Admission No. 5: You ordered abortion-inducing drugs in February of 2025.

RESPONSE: ADMIT.

Request for Admission No. 6: You ordered abortion-inducing drugs from Aid Access in February of 2025.

RESPONSE: ADMIT

Request for Admission No. 7: You ordered abortion-inducing drugs from Aid Access in February of 2025 after you saw and used a link to Aid Access's website that appeared on a website called Plan C Pills (<https://www.plancpills.org>).

RESPONSE: ADMIT

Request for Admission No. 8: You ordered abortion-inducing drugs in February of 2025 with the intent of giving them to Liana Davis.

RESPONSE: ADMIT.

Request for Admission No. 9: You ordered abortion-inducing drugs in February of 2025 for the purpose of terminating Liana Davis's pregnancy.

RESPONSE: Objection. Liana Davis was not pregnant when the abortion-inducing drugs were ordered. Therefore, no termination of any pregnancy could have occurred. DENY.

Request for Admission No. 10: You intended for the abortion-inducing drugs that you ordered in February of 2025 to be used to terminate Liana Davis's pregnancy.

RESPONSE: Objection. Liana Davis was not pregnant when the abortion-inducing drugs were ordered. Therefore, no termination of any pregnancy could have occurred. DENY.

Request for Admission No. 11: The abortion-inducing drugs that you ordered in February of 2025 arrived at your house on or about February 11, 2025.

RESPONSE: ADMIT.

Request for Admission No. 12: You sent a text message to Liana Davis on February 11, 2025, at 7:52 a.m. central time, that said "The pills just got here."

RESPONSE: ADMIT

Request for Admission No. 13: After you texted Liana Davis on February 11, 2025, at 7:52 a.m. central time, to inform her that “The pills just got here,” Ms. Davis responded to your text with a thumbs-down emoji.

RESPONSE: ADMIT

Request for Admission No. 14: You showed Liana Davis the receipt for your purchase of the abortion-inducing drugs.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny.

Request for Admission No. 15: The receipt for your purchase of the abortion-inducing drugs indicates that you purchased the drugs from Aid Access.

RESPONSE: ADMIT

Request for Admission No. 16: On or about February 18, 2025, you brought some or all of the abortion-inducing drugs that you had purchased to Liana Davis’s house.

RESPONSE: ADMIT

Request for Admission No. 17: On or about February 18, 2025, you asked Liana Davis to terminate her pregnancy with some or all of the abortion-inducing drugs that you had purchased.

RESPONSE: Objection. On or about February 18, 2025, Liana Davis was not pregnant.

Request for Admission No. 18: The mifepristone and misoprostol that you ordered were prescribed to “Chris Coopridier.”

RESPONSE: ADMIT

Request for Admission No. 19: The mifepristone pill that you ordered was in a blister pack when it arrived at your house.

RESPONSE: ADMIT

Request for Admission No. 20: You removed the mifepristone pill from its blister pack.

RESPONSE: DENY.

Request for Admission No. 21: You accompanied Liana Davis to her ultrasound appointment on March 21, 2025.

RESPONSE: ADMIT

Request for Admission No. 22: You communicated with Devin Paul Davis.

RESPONSE: ADMIT

Request for Admission No. 23: By April 5, 2025, you knew that you would be unable to persuade Liana Davis to terminate her pregnancy.

RESPONSE: DENY.

Request for Admission No. 24: You made no attempts to persuade Liana Davis to terminate her pregnancy on April 5, 2025.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny.

Request for Admission No. 25: You made no attempts to persuade Liana Davis to terminate her pregnancy on April 4, 2025.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny.

Request for Admission No. 26: You made no attempts to persuade Liana Davis to terminate her pregnancy on April 3, 2025.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny.

Request for Admission No. 27: You made no attempts to persuade Liana Davis to terminate her pregnancy on April 2, 2025.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny.

Request for Admission No. 28: When you arrived at Liana Davis's house on the evening of April 5, 2025, your silver truck was parked in your garage.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny. I do not recall whether my truck was in the garage, street, or driveway.

Request for Admission No. 29: When you arrived at Liana Davis's house on the evening of April 5, 2025, your silver truck was parked in your driveway.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny. I do not recall whether my truck was in the garage, street, or driveway.

Request for Admission No. 30: When you arrived at Liana Davis's house on the evening of April 5, 2025, your silver truck was parked on the street on which you and Ms. Davis lived.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny. I do not recall whether my truck was in the garage, street, or driveway.

Request for Admission No. 31: When you arrived at Liana Davis's house on the evening of April 5, 2025, you brought some or all of the abortion-inducing drugs that you had purchased from Aid Access.

RESPONSE: DENY.

Request for Admission No. 32: Alcohol was mixed into the hot chocolate that Liana Davis drank on the evening of April 5, 2025.

RESPONSE: ADMIT.

Request for Admission No. 33: At or shortly before 12:12 a.m. on April 6, 2025, you promised Liana Davis that you would drive to her mother's residence and return to Ms. Davis's house with her mother.

RESPONSE: DENY.

Request for Admission No. 34: You were aware that Liana Davis's mother was unable to drive when you told Ms. Davis that you would drive to her mother's residence shortly after midnight on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 35: You left Liana Davis's house at approximately 12:12 a.m. on April 6, 2025.

RESPONSE: Pursuant to F.R.C.P. 36(a)(4) I do not have sufficient information to admit or deny. I do not recall the time.

Request for Admission No. 36: Liana Davis sent you a text message at approximately 12:12 a.m. on April 6, 2025, with the address for her mother's residence.

RESPONSE: ADMIT

Request for Admission No. 37: The text message that Liana Davis sent you at approximately 12:12 a.m. on April 6, 2025, contained the address "7122 Premont Drive Apt F102."

RESPONSE: ADMIT

Request for Admission No. 38: You were aware that Liana Davis was bleeding when you left her house at approximately 12:12 a.m. on April 6, 2025.

RESPONSE: ADMIT.

Request for Admission No. 39: You were aware that Liana Davis was in need of medical care when you left her house at approximately 12:12 a.m. on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 40: You were aware that Liana Davis was in danger of losing her pregnancy when you left her house at approximately 12:12 a.m. on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 41: You never picked up Liana Davis's mother on April 6, 2025.

RESPONSE: ADMIT

Request for Admission No. 42: You never drove to Liana Davis's mother's residence on April 6, 2025.

RESPONSE: ADMIT

Request for Admission No. 43: You never drove to the Foxfire Condominiums on April 6, 2025.

RESPONSE: ADMIT

Request for Admission No. 44: You never drove on Premont Street between 12:12 a.m. central time and 1:00 a.m. central time on April 6, 2025.

RESPONSE: ADMIT

Request for Admission No. 45: You never drove anywhere between 12:12 a.m. central time and 1:00 a.m. central time on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 46: Liana Davis called your cell-phone number five times after you left her house on April 6, 2026, at approximately each of the following times: 12:2., at 12:22 , at 12:26, at 12:39 and at 12:45.

RESPONSE: ADMIT

Request for Admission No. 47: You did not answer or return any of the phone calls that Liana Davis made to you on April 6, 2026.

RESPONSE: ADMIT

Request for Admission No. 48: Liana Davis sent you a series of text messages on April 6, 2025, which appear in Exhibit 36 of the complaint (ECF No. 1).

RESPONSE: ADMIT

Request for Admission No. 49: You did not respond to any of the text messages that Liana Davis sent to you in Exhibit 36 of the complaint until 12:44 a.m. on April 6, 2025.

RESPONSE: ADMIT

Request for Admission No. 50: At approximately 1:01 a.m. on April 6, 2025, Liana Davis sent you a text message that said: "Where did you go? You aren't home. Did you even go out to find my mom?"

RESPONSE: ADMIT

Request for Admission No. 51: You never responded to the text message that Liana Davis sent to you at approximately 1:01 a.m. on April 6, 2025, which said: “Where did you go? You aren’t home. Did you even go out to find my mom?”

RESPONSE: ADMIT

Request for Admission No. 52: At approximately 1:24 a.m. on April 6, 2025, Liana Davis sent you a text message that said: “I am at the hospital in the ER.”

RESPONSE: ADMIT

Request for Admission No. 53: You never responded to the text message that Liana Davis sent to you at approximately 1:24 a.m. on April 6, 2025, which said: “I am at the hospital in the ER.”

RESPONSE: ADMIT

Request for Admission No. 54: You never returned to Liana Davis’s house on April 6, 2025, after you left her house at approximately 12:12 a.m. that day.

RESPONSE: ADMIT

Request for Admission No. 55: You never returned to your house on April 6, 2025, after you left Liana Davis’s house at approximately 12:12 a.m. that day, until after 1:00 a.m. on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 56: You never returned to your house on April 6, 2025, after you left Liana Davis’s house at approximately 12:12 a.m. that day, until after 1:30 a.m. on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 57: You never returned to your house on April 6, 2025, after you left Liana Davis’s house at approximately 12:12 a.m. that day, until after 2:00 a.m. on April 6, 2025.

RESPONSE: DENY.

Request for Admission No. 58: You did not have any flights scheduled for April 6, 2025.

RESPONSE: DENY. Please see Disclosed Documents Bate Stamp CR000826 NAVLIR 4/6/2025 CR000826 - 827 FlightGrade 4/6/2025

Request for Admission No. 59: You did not have any flights on April 6, 2026.

RESPONSE: Please see Disclosed Documents Bate Stamp CR000825 NAVLIR 4/6/2025 CR000826 - 827 FlightGrade 4/6/2025

Request for Admission No. 60: You have no evidence that Liana Davis initiated or proposed the idea of holding the “night of trust” that occurred on April 5, 2025, as you allege in paragraphs 14 and 71 of your answer.

RESPONSE: DENY.

Request for Admission No. 61: You have no evidence that Liana Davis knew that she was not pregnant on February 3, 2025, as you allege in paragraphs 13 and 24 of your answer.

RESPONSE: DENY.

Request for Admission No. 62: You have no evidence that Liana Davis knowingly lied about her pregnancy status to Coopriider, as you allege in paragraphs 13 and 24 of your answer.

RESPONSE: DENY.

Request for Admission No. 63: You have no evidence that Liana Davis poisoned Devin Paul Davis, as you allege in paragraph 16 of your answer.

RESPONSE: Objection, this Requests misquotes paragraph 16 of the Answer.

Request for Admission No. 64: You have no evidence that Liana Davis has ever drunk alcohol in the presence of her children, as you allege in paragraph 18 of your answer.

RESPONSE: DENY.

Request for Admission No. 65: You have no evidence that Liana Davis has ever been “drunk” while taking care of her children, as you allege in paragraph 18 of your answer.

RESPONSE: DENY.

Request for Admission No. 66: You have no evidence that Liana Davis has ever been “late to pick up her kids . . . from school,” as you allege in paragraph 18 of your answer.

RESPONSE: DENY.

Request for Admission No. 67: You have no evidence that Liana Davis has ever taken Vyvanse, as you allege in paragraph 19 of your answer.

RESPONSE: DENY.

Request for Admission No. 68: You have no evidence that Liana Davis asked you to order abortion-inducing drugs, as you allege in paragraph 27 of your answer.

RESPONSE: DENY.

Request for Admission No. 69: You have no evidence that Liana Davis “suggested to others that she wanted COOPRIDER to order the pills,” as you allege in paragraph 29 of your answer.

RESPONSE: DENY.

Request for Admission No. 70: You have no evidence that “on February 21, 2025, DAVIS faked taking the first of the three pills, and on February 23, 2025, DAVIS faked taking the two other pills,” as you allege in paragraph 34 of your answer.

RESPONSE: DENY.

Request for Admission No. 71: On March 5, 2025, you told the Corpus Christi police that Liana Davis “took abortion pills.”

RESPONSE: ADMIT

Request for Admission No. 72: You have no evidence that Liana Davis “took abortion pills” on or shortly before March 5, 2025, as you told the Corpus Christi police.

RESPONSE: DENY. On February 21 and 23, Liana Davis lied that she had taken abortion pills and that she was in the process of aborting her baby. On

March 5, 2025, Liana Davis lied that she was "code red" and sitting in a "pile of blood." I relayed the information provided by Liana Davis to the Corpus Christi police.

Request for Admission No. 73: You have no evidence that Liana Davis deleted material from your phone, as you allege in paragraph 74 of your answer.

RESPONSE: DENY.

Request for Admission No. 74: You have no evidence that Liana Davis "prepared" hot chocolate "together" with you on the night of April 5, 2025, as you allege in paragraph 75 of your answer.

RESPONSE: DENY.

Request for Admission No. 75: While the hot chocolate was being prepared in the kitchen on the night of April 5, 2025, there were at least some moments when Liana Davis was not present in the kitchen while you were preparing the hot chocolate.

RESPONSE: DENY.

Request for Admission No. 76: You have no evidence that Liana Davis "put alcohol in her [hot chocolate]" on the night of April 5, 2025, as you allege in paragraph 76 of your answer.

RESPONSE: DENY.

Request for Admission No. 77: On April 7, 2025, at approximately 10:36 a.m. central time, Liana Davis sent you a text message and asked, "How many pills did you give me, Chris? Was it all 10?"

RESPONSE: ADMIT.

Request for Admission No. 78: On April 7, 2025, at approximately 10:36 a.m. central time, you texted Ms. Davis and said: "You consented multiple times."

RESPONSE: ADMIT.

Request for Admission No. 79: You have no evidence that Liana Davis ever "consented" to taking abortion pills.

RESPONSE: DENY.

Request for Admission No. 80: You have no evidence that Liana Davis “drank alcohol heavily while pregnant,” as you allege in paragraph 127 of your answer.

RESPONSE: DENY.

November 20, 2025

Respectfully submitted,
BETH KLEIN, P.C.

By: /s/ Beth Klein
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CERTIFICATE OF SERVICE

I hereby certify that on November 20 , 2025, a copy of the foregoing discovery request was sent via email to all counsel of record.

/s/ Beth Klein
Beth Klein

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 LIANA DAVIS

1. My name is Liana Davis. 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 am the named plaintiff in this litigation, and I submit this declaration in support of the reply brief in support of the motion to quash the subpoena that was served on my mother, Mary Anna Ziarko.

4. Devin Davis did not carry out a custody exchange on June 25, 2026, and his claim in his declaration that we carried out custody exchange on June 25, 2026, is false. *See* Devin Davis Decl., ECF No. 114. at ¶ 4. Devin had custody of the children for five more days after June 25, 2026, and no exchange of custody occurred on that June 25, 2026.

5. Devin Davis's claim that I placed the "sole care" of our three children with my mother when I was hospitalized on July 15, 2026, is false. *See* Devin Davis Decl., ECF No. 114. at ¶ 5. When I was hospitalized and giving birth to my twins, I left my children in the care of no fewer than three adults: Marshall Bowling (the father of our

twins), Mr. Bowling's mother, and Ms. Ziarko. Mr. Bowling's father also stopped by the house during this time to assist. At no time during this hospitalization did I leave my children in the "sole care" of my mother.

6. All of the text messages that I have exchanged with my mother on April 5–6, 2026, are retrievable from the cell phone that I previously turned over to Array LLC.

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: 8/24/2026

Signed by:

330405A4516E4TA...
LIANA DAVIS