

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

DEFENDANT CHRISTOPHER COOPRIDER'S
DESIGNATION OF EXPERT WITNESSES

Pursuant to the Federal Rules of Civil Procedure, Defendant Christopher Coopriders
hereby serves its Expert Disclosures.

I.
EXPERTS DESIGNATED BY COOPRIDER

1. Retained Experts

Defendant Coopriders hereby designates the following persons as testifying retained experts on behalf of Defendant Coopriders. Defendant reserves to right to call at trial, either by subpoena or deposition, all persons listed within this designation of Experts, as well as any supplements and/or amendments thereto. In addition, Coopriders reserves the right to use all, or a portion, of such expert testimony for factual purposes or other use at the time of trial

A. Stacey L. Hail, MD, FACMT
4501 Belfort Avenue
Dallas, Texas 75205
(214) 354-8790
Stacemd99@aol.com

Stacey Hail, M.D. is a retained expert who is an emergency medicine physician and a medical toxicologist double board-certified by the American Board of Emergency Medicine. She

has been retained as a medical expert to present evidence at trial under Federal Rules of Evidence 702, 703 and 705. She will testify regarding her qualifications, including her education, training, experience, and methodology. Dr. Hail may testify regarding the pharmacology and toxicity of misoprostol and how to perform an assessment of a potential toxicological exposure, including any biological plausibility known about a substance in published literature. Dr. Stacey Hail may testify how quickly acute misoprostol toxicity would induce symptoms such as vaginal bleeding, abdominal pain, nausea, vomiting, diarrhea, headache, and fever. Dr. Hail may testify about the signs and symptoms of acute misoprostol overdose such as fever and tachycardia. Dr. Hail will offer testimony concerning reasonable medical standards for assessing misoprostol; whether the medical care and treatment provided to Plaintiff for her post-incident miscarriage met medical standards. Dr. Hail may render an opinion about the likelihood of intentional poisoning of Plaintiff with misoprostol.

Stacey Hail, M.D. will render opinions based upon her knowledge, skill, training, and experience, regarding relevant topics. She may also offer rebuttal testimony as to any and all competing retained and non-retained experts presented by any other party to this matter as necessary and appropriate and reserves the right to supplement her opinion as discovery continues.

Documents, tangible things, and reports that have been or will be provided to Dr. Hail may include copies of all discovery responses, information, medical records, documents, and other items produced by Plaintiff Liana Davis or produced through subpoena from Plaintiff's medical providers. Dr. Hail has been or will be provided all relevant pleadings, discovery responses, deposition transcripts and/or witness statements in this case.

Defendant Coopridier further reserves the right to amend and/or supplement this designation pursuant to the Federal Rules of Civil Procedures, Order(s) of this Court, and/or

agreements(s) between the parties.

Exhibit “A” – CV of Dr. Hail
Exhibit “B” – List of testimony/cases for Dr. Hail
Exhibit “C” – Fee schedule for Dr. Hail
Exhibit “D” – Dr. Hail’s Expert Report

B. Roberta L. Krueger, M.D.
7922 Ewing Halsell #310
San Antonio, Texas 78229
(210) 260-7928
Bobbie.satx@yahoo.com

Roberta Krueger, M.D. is a retained expert who is an obstetrician and gynecologist board-certified by the American Board of Obstetrics and Gynecology. She has been retained as a medical expert to present evidence at trial under Federal Rules of Evidence 702, 703 and 705. She will testify regarding her qualifications, including her education, training, experience, and methodology. Dr. Krueger may testify based on reasonable medical probability that Plaintiff suffered a first-trimester loss of a fetus she was carrying due to an unhealthy pregnancy. Dr. Krueger may testify that Plaintiff’s HCG levels during the pregnancy at issue indicated a failing pregnancy. Dr. Krueger may testify that there were other factors that contributed to Plaintiff’s early pregnancy loss, including but not limited to, Plaintiff’s advanced maternal age and low progesterone levels. Dr. Krueger will offer testimony that in her medical opinion, Plaintiff’s allegations that abortion medications allegedly placed in hot chocolate and allegedly consumed by Plaintiff, did not cause Plaintiff’s early pregnancy loss. Dr. Krueger will offer testimony concerning reasonable medical standards for assessing the effects and usage of mifepristone and misoprostol/Cytotec and whether ingestion of such medication was the cause of Plaintiff’s early pregnancy loss.

Roberta Krueger, M.D. will render opinions based upon her knowledge, skill, training, and experience, regarding relevant topics. She may also offer rebuttal testimony as to any and all

competing retained and non-retained experts presented by any other party to this matter as necessary and appropriate and reserves the right to supplement her opinion as discovery continues.

Documents, tangible things, and reports that have been or will be provided to Dr. Krueger may include copies of all discovery responses, information, medical records, documents, and other items produced by Plaintiff Liana Davis and/or received through subpoena from Plaintiff's medical providers. Dr. Krueger has been or will be provided all relevant pleadings, discovery responses, deposition transcripts and/or witness statements in this case.

Defendant Coopridier further reserves the right to amend and/or supplement this designation pursuant to the Federal Rules of Civil Procedures, Order(s) of this Court, and/or agreements(s) between the parties.

Exhibit "E" – CV of Dr. Krueger
Exhibit "F" – Fee schedule for Dr. Krueger
Exhibit "G" – Dr. Krueger's Expert Report

2. The following witnesses have been listed and designated as persons with knowledge of relevant facts. These persons are not retained experts but may testify about issues to be addressed and/or addressed in their testimony. These witnesses, whose expertise is the result of their work experience, education and/or training, are not being paid as experts and as such, are treated as ordinary witnesses for purposes of discovery. Defendant Coopridier reserves the right to elicit opinion testimony from any of the following witnesses in their particular expertise:

(a) George Vasiliou
Magnet Forensics

Mr. Vasilou performed a forensic examination on Davis's digital devices. For the results of his examination, please see his forensic examination report dated May 16, 2026.

(b) Jake Nee
Forensics Project Manager
Array
5508 US Hwy 290 West
Suite 350

Austin, TX 78735

Mr. Nee performed a forensic examination on Davis's digital devices.

(c) Jeffrey Sparks
3801 Holland Drive
Corpus Christi, TX 78418
361-443-6984

Mr. Sparks is a forensics expert who has interacted and communicated with Liana Davis and who possesses relevant information, documentation, data, etc. related to this litigation.

(d) Detective Michael Manzano
Corpus Christi Police Department

The testimony of Detective Michael Manzano provides a detailed account of his investigation into allegations made by Liana Davis against Christopher Coopridier. Detective Manzano, a seasoned investigator with the Corpus Christi Police Department, outlines his role in the investigation, which included reviewing incident reports, gathering evidence, and consulting with the district attorney's office. Despite receiving various emails and evidence from Ms. Davis, including audio recordings and text messages, the investigation concluded with the decision not to pursue charges against Mr. Coopridier, as the case was deemed unfounded.

(e) Dunsworth, David C.
9256 Ave. D, Suite 347
Corpus Christi, Texas 78419
(919) 357-5458

Lt. Col. Dunsworth is the Commanding Officer, Training Squadron Thirty-Five, who has knowledge of his communications with Defendant regarding the allegations in the Complaint. He also has knowledge of Defendant's flight training and flights.

(f) Ford, James C.
320 5th St.
Corpus Christi, Texas 78419
(760) 586-2205

Col. Ford is the Commanding Officer of Marine Aviation Training Support Group – 22 ("MATSG-22"). He has knowledge of his communications with Defendant regarding the allegations in the Complaint. He has knowledge of Defendant's flight training and flights.

(g) Grell, Travis C.
9256 Ave. D, Suite 347
Corpus Christi, Texas 78419
(979-877-8302

Lt. Col. Grell is a flight instructor for Training Squadron Thirty-Five, who has knowledge of

his communications with Defendant regarding the allegations in the Complaint. He also has knowledge of Defendant's flight training and flights.

(h) Madrigal, Melissa;
4425 Ramona Drive
Corpus Christi, Texas 78416
(361) 816-6315

Judge Madrigal is the Judge Advocate for the children of Plaintiff and has knowledge of her communications with Plaintiff and actions in Plaintiff's divorce and the actions that she took in that matter including the removal of the children from Plaintiff's custody for their safety.

3. Non-Retained Experts

(a) Christine Canterbury, MD
Luann K. Hassan, MD
Jacqueline Villanueva-Penaflor APRN FNP
Corpus Christi Women's Clinic
7121 South Padre Island Drive, Suite 302
Corpus Christi, Texas 78412
(361) 851-500

Drs. Canterbury and Hassan, and Nurse Practitioner Jacqueline Villanueva-Penaflor tested, and treated Liana Davis before and immediately after the pregnancy in April 2025 which is the subject of this litigation. Her treating physicians will testify to her condition and their opinions as to the cause of the loss of her pregnancy.

(b) Dustin L. O'Hern, MD
Corpus Christi Medical Center – Bay Area
7101 South Padre Island Drive
Corpus Christi, Texas 78412

Dr. O'Hern treated Liana Davis on the date of incident in the Corpus Christi Medical Center Emergency Department and can testify as to her physical condition and the findings on the day of incident.

(c) Pregnancy Center of Coastal Bend
6133 Ennis Joslin Road
Corpus Christi, Texas 78412
(361) 991-2008

Plaintiff was provided testing and treatment services by Pregnancy Center of Coastal Bend during the relevant times of this litigation.

(d) Any Lab Test Now
5417 Everhart Rd.
Corpus Christi, Texas 78411
(361) 400-0707

This medical provider has knowledge of the testing, diagnosis, and treatment it has provided to Plaintiff.

4. Defendant respectfully reserves the right to elicit testimony from any and all persons or witnesses designated or to be called by Plaintiff in this case. Defendant reserves the right to offer at trial, from any person or fact witness designated by Plaintiff with the express understanding that Defendant does not necessarily vouch for the credibility, qualifications, or proper designation of any such witnesses.

II.

OTHER PARTIES' EXPERTS

5. Defendant Coopriders hereby further designates all persons listed now or in the future by all other parties in this lawsuit. Defendant reserves the right to call at trial, either by subpoena or deposition, the persons designated as experts by any other party. Defendant is not necessarily adopting any or all of the opinions of such individuals. Furthermore, this designation does include any individual who is at any time de-designated by any other party in this matter.

III.

RIGHT TO DE-DESIGNATE

6. Defendant Coopriders reserves the right to de-designate any experts and/or re-classify them as consulting only experts in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, LLP

/s/ Barry A. Moscowitz

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CERTIFICATE OF SERVICE

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

/s/ Victoria L. Jimenez
Victoria L. Jimenez