

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.

PLAINTIFF’S MOTION FOR PRE-MOTION CONFERENCE

Plaintiff Liana Davis respectfully moves for a pre-motion conference on each the following three issues.

1. On September 17, 2026, Mr. Coopridier’s attorneys designated two expert witnesses, Stacey L. Hail and Roberta L. Krueger, and served their expert reports on Ms. Davis. *See* Docket Entry 136. Ms. Davis wishes to designate one or more rebuttal experts, but the Court’s scheduling order of November 13, 2025 (Docket Entry 29), does not provide a timetable for designating rebuttal experts.

Ms. Davis’s attorney e-mailed Mr. Coopridier’s legal team on September 17, 2026, and asked if they would agree on a timetable for designating rebuttal experts that the parties could jointly propose to the Court. Mr. Mitchell wrote:

We intend to designate one or more rebuttal experts, but the Court’s scheduling order does not provide a deadline for designating rebuttal experts. May we confer on a timetable for designating rebuttal experts and propose it to the Court?

Exhibit 1. On September 18, 2026, Mr. Watts wrote back and said: ““We will not agree . . . to your desire to designate experts after your deadline to do so has passed.”

Exhibit 2.

Ms. Davis therefore respectfully requests a pre-motion conference with the Court before moving to amend the scheduling order to provide for designation of rebuttal experts.

2. Aid Access B.V. still has not been served, and Ms. Davis needs to take discovery from Aid Access B.V. before this case goes to trial. Ms. Davis anticipates that Aid Access B.V. will designate its own experts in an attempt to rebut Ms. Davis's wrongful-death claim. Given that, Ms. Davis believes that it would be more efficient to stay expert discovery until service is effectuated on Aid Access B.V. and fact discovery with respect to Aid Access is completed.

Ms. Davis continues to believe that fact discovery with respect to Mr. Coopridier should close on October 15 or shortly thereafter. But she respectfully requests a pre-motion conference before moving to amend the scheduling order to stay expert discovery until Aid Access B.V. is served and Aid Access designates its expert witnesses.

3. This case cannot go to trial until Aid Access B.V. is served and Ms. Davis has taken discovery from Aid Access B.V. Mr. Coopridier's legal team insisted on moving ahead with fact discovery before Aid Access was served, and Ms. Davis accommodated Mr. Coopridier's desire to move quickly into discovery. But Ms. Davis is suing both Mr. Coopridier and Aid Access for wrongful death, and Aid Access's liability for wrongful death depends on whether Mr. Coopridier poisoned Ms. Davis with misoprostol.

Mr. Davis therefore respectfully requests a pre-motion conference before moving to stay the trial date and trial-related deadlines until service is effectuated on Aid Access B.V. and discovery is taken.

We have conferred with Mr. Coopridier's lawyers on these matters and they oppose any changes to the scheduling order, as well as any stay of the trial date or trial-related deadlines. *See* Exhibit 2. They have asked us to mark them as opposed to this motion for a pre-trial conference. *See id.*

CONCLUSION

Ms. Davis's motion for a pre-motion conference should be granted.

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
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S.D. Tex. Bar No. 1133287
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(512) 686-3941 (fax)
jonathan@mitchell.law

Dated: September 22, 2026

Counsel for Plaintiff Liana Davis

CERTIFICATE OF SERVICE

I certify that on September 22, 2026, I served this document through CM/ECF upon:

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Counsel for Defendant Christopher Coopridier

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



From: Jonathan Mitchell jonathan@mitchell.law

Subject: expert discovery

Date: September 17, 2026 at 10:44 PM

To: O'Flannigan, Kenna KOFlannigan@thompsoncoe.com, Moscovitz, Barry BMoscovitz@thompsoncoe.com, Jimenez, Victoria VJimenez@thompsoncoe.com, Dupen, Craig CDupen@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, Verweij, Beth EVerweij@thompsoncoe.com, Mikal Watts mikal@wattslp.com, Beth Klein beth@bethklein.com, McKenzie, Davina DMcKenzie@thompsoncoe.com

Cc: John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Talcott Franklin tal@tfpc.me

Counsel:

I need to confer with you about several issues regarding expert discovery in light of the expert reports that you served earlier today.

(1) We intend to designate one or more rebuttal experts, but the Court's scheduling order does not provide a deadline for designating rebuttal experts. May we confer on a timetable for designating rebuttal experts and propose it to the Court?

(2) Aid Access B.V. still has not been served, and we need to take discovery from Aid Access B.V. before this case goes to trial. I expect that Aid Access B.V. will designate its own experts in an attempt to rebut Ms. Davis's wrongful-death claim. Given that, it would be more efficient in our view to stay expert discovery until service is effectuated on Aid Access B.V. and fact discovery with respect to Aid Access is completed. I think we can (and should) close fact discovery with respect to Mr. Coopridier on October 15 or shortly thereafter.

(3) This case cannot go to trial until Aid Access B.V. is served and we have taken discovery from Aid Access B.V. You insisted on moving ahead with fact discovery before Aid Access was served, and I accommodated your request. But Ms. Davis is suing both Mr. Coopridier and Aid Access for wrongful death, and Aid Access's liability for wrongful death depends on whether Mr. Coopridier poisoned Ms. Davis with misoprostol. So we need to discuss staying the trial date and related deadlines until service is effectuated on Aid Access and discovery is taken.

Please let me know when you are available to confer on these issues.

—Jonathan

Jonathan F. Mitchell
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From: Mikal Watts mikal@wattslp.com

Subject: Re: expert discovery

Date: September 18, 2026 at 3:19 AM

To: Jonathan Mitchell jonathan@mitchell.law, O'Flannigan, Kenna KOfIannigan@thompsoncoec.com, bmoscowitz BMoscowitz@thompsoncoec.com, Jimenez, Victoria VJimenez@thompsoncoec.com, Dupen, Craig CDupen@thompsoncoec.com, Hamby, Oliver OHamby@thompsoncoec.com, Verweij, Beth EVerweij@thompsoncoec.com, Beth Klein beth@bethklein.com, McKenzie, Davina DMcKenzie@thompsoncoec.com

Cc: John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Talcott Franklin tal@tfpc.me

Jonathan,

We will not agree to stay the trial date, nor to your desire to designate experts after your deadline to do so has passed. You may file your motions and note us as opposed to both.

With highest regards,

Mikal

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From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Friday, 18 September 2026 00:44:02

To: O'Flannigan, Kenna <KOfIannigan@thompsoncoec.com>; bmoscowitz <BMoscowitz@thompsoncoec.com>; Jimenez, Victoria <VJimenez@thompsoncoec.com>; Dupen, Craig <CDupen@thompsoncoec.com>; Hamby, Oliver <OHamby@thompsoncoec.com>; Verweij, Beth <EVerweij@thompsoncoec.com>; Mikal Watts <mikal@wattslp.com>; Beth Klein <beth@bethklein.com>; McKenzie, Davina <DMcKenzie@thompsoncoec.com>

Cc: John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Talcott Franklin <tal@tfpc.me>

Subject: expert discovery

Counsel:

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on whether Mr. Coopridge poisoned Ms. Davis with misoprostol. So we need to discuss staying the trial date and related deadlines until service is effectuated on Aid Access and discovery is taken.

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—Jonathan

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CORPUS CHRISTI DIVISION

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-00220

**Christopher Coopriders; 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 Ms. Davis's motion for a pre-motion conference.

4. The documents attached as Exhibits 1 and 2 to this motion are authentic copies of e-mails that were exchanged between Ms. Davis's and Mr. Coopriders's lawyers.

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



JONATHAN F. MITCHELL

Dated: September 22, 2026