

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

Liana Davis,	*	
Plaintiff,	*	
	*	
v.	*	Case No. 2:25-cv-220
	*	
Christopher Coopriders, et al.	*	
Defendants.	*	

**RESPONSE TO PLAINTIFF’S MOTION TO REQUIRE PRODUCTION OF
COMMUNICATIONS AND DOCUMENTS RELATED TO THE
UNAUTHORIZED ACCESS OF PLAINTIFF’S IPHONE**

Defendant Christopher Coopriders (“COOPRIDERS”) responds to Plaintiff’s Motion To Require Production of Communications and Documents related to the Unauthorized Access of Plaintiff’s iPhone.

I. Introduction

Plaintiff filed a mislabeled Motion to Compel without citing any authority demanding a Court Order compelling and ordering:

- 1). Defense Counsel to produce all of their communications relating to Ms. Plaintiff’s iPhone or other devices or any data on those devices;
- 2) Mr. Vasiliou and Defense Counsel to disclose to Mr. Mitchell all material from Ms. Plaintiff’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 Plaintiff’s iPhone or other devices, and

3) An award of attorneys' fees for the time that Plaintiff's lawyers spent on this motion solely based upon the Texas Lawyer's Creed.

As set forth below, Plaintiff's counsel did not serve any discovery requests for any documents. He simply made informal, overbroad and differing demands and filed the motion. Unfortunately, Plaintiff's counsel has omitted material communications actually providing the Artifacts to him and which only included his one-sided emails that he characterizes as "threats." He was not ignored; he was provided with the Artifacts.

Plaintiff was also provided with direct responses to his questions and heard the explanations to the Court of what happened. Plaintiff 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.

Plaintiff obstructed further progress in the appointment of the successor court appointed expert, Array, LLC using the misinterpretation of the order as an excuse. Mr. Mitchell has ignored the requests of Array, to finalize a contract for payment; he would not provide his address or otherwise communicate about the new contract. He refused to pay for any portion of the past due amounts charged by Array to obtain a mirror images of Plaintiff's computer. He avoided negotiations on any terms about how to access Plaintiff's iCloud holding 53 GB of text data. He has served baseless objections to the ESI Discovery requests that must now be resolved by the Court. There is work to be done, and Plaintiff has used the misreading of the Court's May 14, 2026 Order not to do the work.

More importantly, when the facts and logical case progression are considered, Plaintiff has suffered no prejudice at all. With or without the misreading of the order, the Artifacts would be discovered and used as evidence in the case. Defendant agrees that the Vasiliou extractions should be provided to Mr. Mitchell so that he can review them. Mr. Mitchell should then provide his responses and privilege log, if any, promptly. This resolves issue No. 2 and complies with the May 14, 2026 Order. In the alternative, Array, LLC. should be immediately appointed as the successor Court appointed expert, the contract and payment should be finalized so that Array, LLC will perform the Defendants ESI extraction for a second time. Either way or both ways, the results will be the same. The same disclosed Exhibit 40 and other Artifacts will be extracted. And these represent a tiny fraction of the extraction that has been and may be again performed on Plaintiff's first cell phone, her second phone, burner phones, computers and iCloud.

II. What happened caused no harm or prejudice. Had the May 14, 2026 Order been followed, the outcome would be the same.

Four Artifacts extracted from Plaintiff's iPhone and a limited number of questions at Plaintiff's deposition concerning child abuse are at issue here based upon Defendant's misreading of the Court's May 14, 2026 Order. The four non-privileged, relevant Artifacts would have been eventually produced in this case, and two should have been produced in discovery already (Plaintiff falsely denied they existed in response discovery.) The child abuse questions are obvious. Plaintiff has not shown that the discovery outcome and production of these very limited materials would have been any different had a stipulation or second order been obtained.

On May 14, 2026 pursuant to FRCP 29(b) COOPRIDER filed his FRCP 29(B) Motion for Shortened Time to Response to ESI Discovery, to Compel Production of Plaintiff's Devices and Access to Her iCloud. ("MOTION"). The specific relief requested was that Plaintiff immediately produce all of her I-phone, all phones 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 preservation imaging, and that the Expert be ordered to *immediately extract* the ESI from the mirror image of Plaintiff's phone. That same day, the Court granted COOPRIDER'S Motion. The Court stated, "The devices and access shall be provided as defined in the ESI requests." The Court's Order and ESI Request was provided to the Expert who immediately began to extract the ESI from the mirror image of Plaintiff's phone as set forth as the relief in the Motion.

On May 28, 2026 *both Plaintiff and Defendant* believed that immediate extraction pursuant to the Defendant's ESI request was to occur. Mr. Mitchell's email dated May 28 to Mr. Vasiliou shows that *Plaintiff believed that the extraction had been ordered*. Plaintiff knew and expected that Mr. Vasiliou was conducting the extraction; this was not random rummaging round as recently characterized.

On May 28, 2026, at 2:50 PM, Jonathan Mitchell jonathan@mitchell.law wrote:

George:

Thank you for all of your work on my client's devices. I have a question about the attached forensic examination report. It appears that you prepared and sent this report to Ms. Klein, and it contains several

verbatim excerpts from my client's "Notes" app that you extracted from her iPhone. Ms. Klein introduced this document as an exhibit at my client's deposition earlier today.

My understanding was that you would not be producing any of the data from my client's devices absent a court order or stipulation of the parties, and that you would secure the data and serve as custodian of the data until a court order or stipulation authorized disclosure of the data.

Perhaps I misunderstood the arrangement, but could you please explain why you disclosed these notes to Ms. Klein? Is it your understanding that I am also authorized to obtain some or all of the data that you extracted from Mr. Coopriders' devices? Both my client and I thought that counsel would be unable to access the contents of any of these devices absent a stipulation or order of the court. It is also not clear to me why those particular notes were shared with Ms. Klein and not others.

Thank you considering this, ***and my apologies if there was a misunderstanding on my part about how the data would be shared with opposing counsel post-extraction.***

-Jonathan

As of May 28, 2026, the only concern was about the misunderstanding between the parties was whether the May 14, 2026 Court order required a Stipulation or another Court Order for production of documents to the Defense. Defendant believed that the Court had reviewed the ESI request and saw the time parameters and counsel exclusions and had approved it for immediate discovery as requested in the MOTION. Even Mr. Mitchell calls the issue a misunderstanding; far different that the recast characterization in the MOTION.

Attached to the MOTION was a draft of a stipulation (D.E. 66-1) that Plaintiff would not sign providing the time for turnover of her devices to Mr. Vasiliou. He had been waiting in Corpus Christi for several days and had returned to Dallas on May 14, 2026. He was not provided with Plaintiff's computers, and no one can access

Plaintiff's iCloud where 53 GB of text data resides, other than Plaintiff. Plaintiff and Mr. Mitchell both know that the iCloud text data cannot be and has not been accessed. The newly discovered second phone has not been turned over to any expert. There may be another burner phone as well.

The May 14, 2026 Order provided that Plaintiff had to turn over her devices by May 15, 2026 at 3:00 pm to Mr. Vasiliou, but he could not return to Corpus Christi. Mr. Mitchell took the position that finding a new expert or to meet the deadline was solely COOPRIDER'S problem. Plaintiff refused to take or courier her computer to the Mr. Vasiliou who was waiting at the Dallas offices of Thompson Coe working on the extraction that every lawyer expected to occur. Array, LLC. a forensics company was frantically located, and the company immediately cleared conflicts and was substituted for Mr. Vasiliou to comply with the Order. Days later in violation of the deadline, Plaintiff mailed her computer to Array. Plaintiff did not produce her phone that she used to record COOPRIDER on April 5, 2026 or any burner phone.

D.E. 66-1 also contained the language "subject to the process described in the proposed stipulation provided by Defendant Cooprider, (D.E. 66-1). The purpose of this Order is to allow for merits discovery as well as discovery regarding spoliation of evidence." COOPRIDER read this as being consistent with the fact that he had already obtained a Court order for immediate extraction of the phone data and that the Court wanted merits discovery and discovery of spoliation of evidence to proceed. The Court intended that another order issue. COOPRIDER has apologized for his error.

Mr. Vasiliou performed the extraction with the searches in the ESI request to Plaintiff. He used the time frame from January 2025 through the current date, the keyword search list, and the exclusion list. His work terminated at the end of Plaintiff's deposition. He has held the extractions and the mirror images of Plaintiff's phone and COOPRIDER'S phone and two computers. He would like to have an order directing him to whom to send the extractions and the mirror imaging data.

With the exception of four 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.

The four artifacts include 1) the forensic report Exhibit 40, 2) a pregnancy conception calculation document, 3) a menstruation tracking document (which Plaintiff denied existed and has not produced)¹ and 4) a screen shot showing that Plaintiff changed the name of Ami Amoroso in her contracts to the letter "A" and wiped her texts off her phone up to the moment in time she turned her cell phone over to the forensics expert.

By June 14, 2026 Mr. Mitchell had not reviewed all four artifacts disclosed to him two weeks before as he continued to demand them. Indeed, Mr. Mitchell did not review the documents provided to him before he filed this motion. At the same time,

¹ REQUEST FOR PRODUCTION NO. 25: Produce all DOCUMENTS reflecting YOUR documentation of YOUR menstrual cycle.

RESPONSE: Plaintiff did not start using an app to document her menstrual cycle until October 2025. Plaintiff therefore objects to this request because her menstrual cycle from October 2025 onward is not "relevant to any party's claim or defense and proportional to the needs of the case." Fed. R. Civ. P. 26(b)(1).

he claims he was ignored when he was not. He was promptly provided with explanations and documents.

Had COOPRIDER proceeded with the May 14, 2026 Order and obtained a second court order, the ultimate results would be exactly the same. The ESI search results to be conducted by Array, LLC will result in the same evidence productions - and more and probably far worse evidence for Plaintiff - when the computer, second phone, and iCloud are searched. Exhibit 40 is not privileged and is relevant. The pregnancy and menstruation tracking memos should have been produced long ago and their existence was denied under oath. Evidence of text message destruction and manipulation of evidence will come out again with additional evidence when Plaintiff fully complies with the production of her devices and iCloud.

In sum, there has been no prejudice to Plaintiff through the misreading of the May 14, 2026 Order.

III. Plaintiff produced her phone for mirror imaging to NCIS and was required to produce the image in discovery anyway.

In March 2026, Plaintiff produced her phone to NCIS for mirror imaging. She waived all of her rights to privacy and privilege with the disclosure of this data to a third party.

Plaintiff was requested to provide all communications with NCIS in RFP No. 5 served in September 2025.

5. ALL COMMUNICATIONS between YOU and the following individuals or entities between November 1, 2024 and the present:

- (a) Corpus Christi Police Department;
- (b) Nueces County District Attorney's Office;
- (c) Texas Attorney General's Office;

- (d) Naval Criminal Investigative Service;
- (e) Marine Judge Advocates within the United States Marine Corps;
- (f) United States Attorney's Office for the Southern District of Texas; and
- (g) United States Department of Justice;

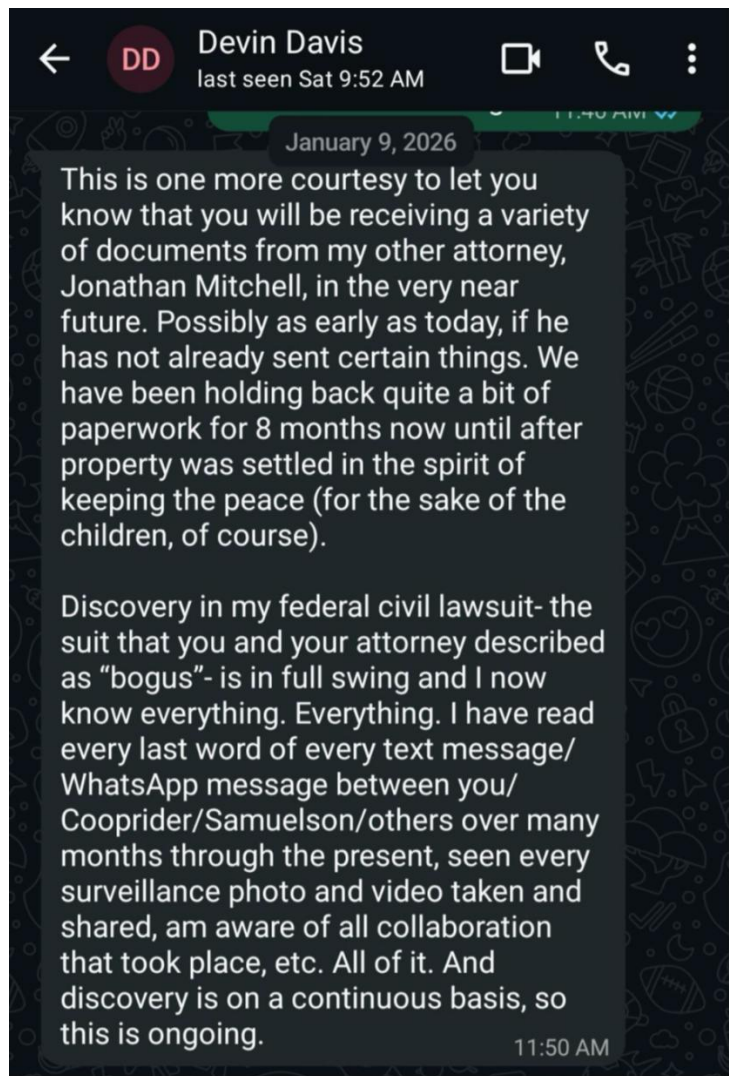
concerning YOU, YOUR pregnancy(ies), the termination thereof – whether real or suspected, and/or CHRIS COOPRIDER.

Plaintiff should have provided a copy of the mirror image of her phone she gave to NCIS to COOPRIDER in response to discovery, but did not. The NCIS mirror image was essentially requested in discovery in September 2025 and will have to be produced. But the fact is that this evidence would have come out no matter what, and Plaintiff has failed to prove any harm or prejudice caused by the misreading of the order.

IV. Plaintiff's list of depositions questions relate to the Artifacts, child abuse concerns already disclosed and general foundation questions.

Plaintiff seems to be under the impression that the sole source of evidence is limited to that which Plaintiff provides. The reality is that there are a shocking number witnesses who have come forward to independently provide damning evidence against Plaintiff. Beginning at Page 13 of the Motion, Plaintiff lists questioning in the Plaintiff's deposition. These areas of questioning are primarily related to the 4 Artifacts and the child abuse concerns. Other questions are foundation and general background questions.

Devin Plaintiff, Plaintiff's ex-husband, himself provided the threatening text message that Plaintiff denied she ever sent. (Page 77 Plaintiff depo, Item n) But she did in fact send this text to her ex-husband.

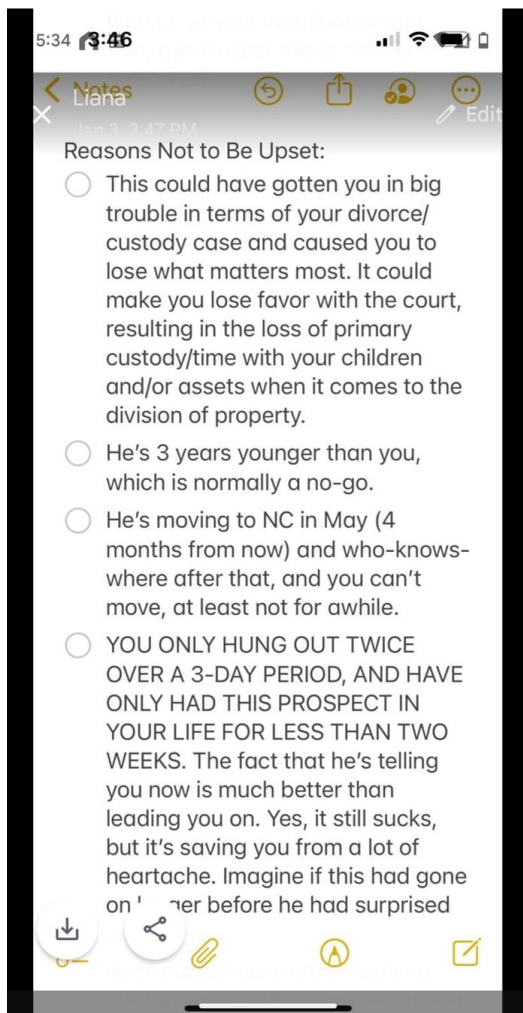


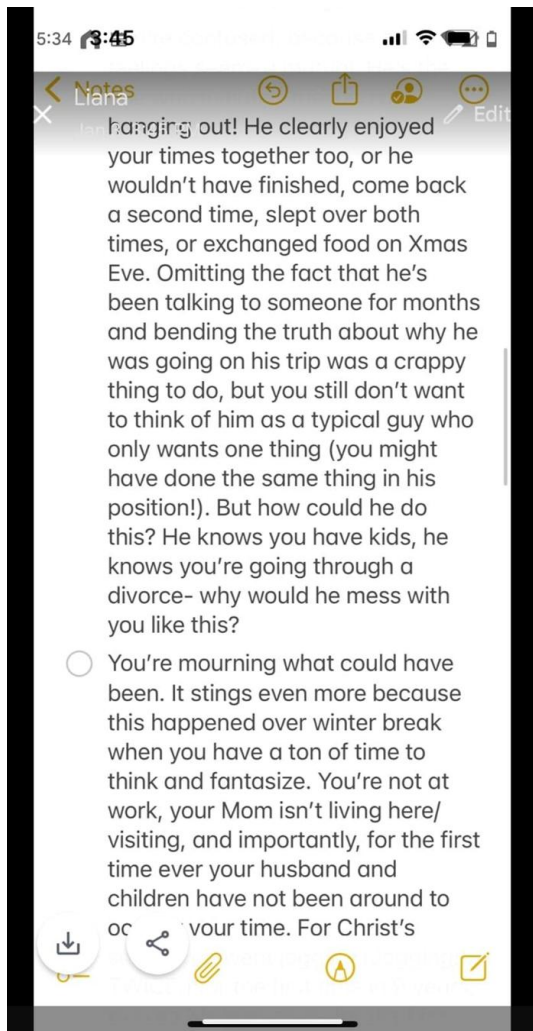
Jeffrey "Jeff" Sparks curiously a forensics expert who has been one of the men dating and financially supporting Plaintiff until early June 2026 when he learned that the twins Plaintiff is carrying he was led to believe were his -- were fathered by a different man. He has provided information about other phones and matters of concern including his fundraising for this case. Once he was disclosed as a witness for the Defendant Plaintiff contacted Mr. Sparks and told him to shut up and quit talking to the Defense lawyers.

General spoliation and foundation questions about the location of data and

manipulation of data would have been asked regardless of any ESI order due to Plaintiff's sophistication with deleting evidence to mislead the Family Law Court and mindset to evade production.

How Plaintiff uses notes to organize and process her thoughts are pattern and practice questions. In the secret audio recordings made by Plaintiff on April 5, 2025 she talks at length about her extensive use of notes. Plaintiff provided her notes on how she was processing her obsession with the Defendant. That was disclosed in the initial disclosures called "obsession files." Bates 832 -840, excerpt:





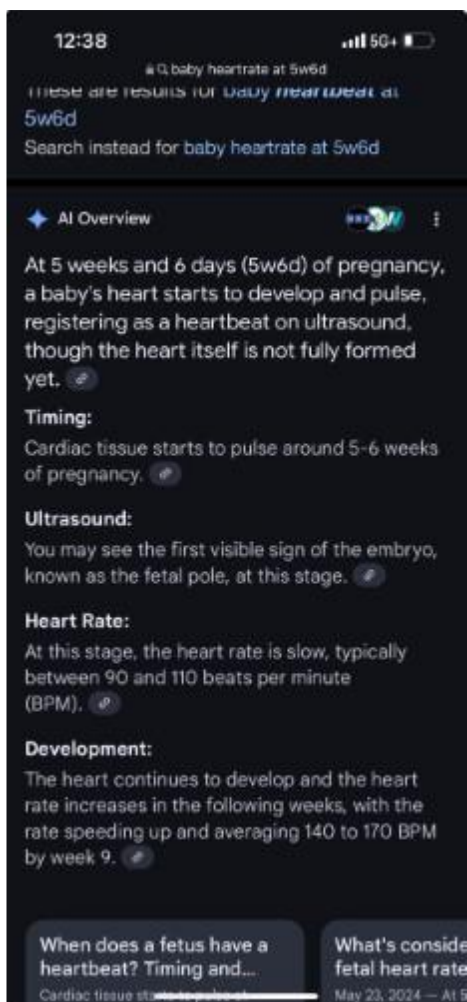
Questions concerning Marshall Bowling a potential father of her two most recent pregnancies and twins (not Mr. Sparks) and who lives at her house are not unusual. The Coopriders house is next door to the Plaintiff house. Mr. Bowling lives with Plaintiff, and his car is parked in front of the house all of the time. It is incredible that Plaintiff denied that Bowling lives in her house when it is obvious that he does. Additionally, Mr. Bowling picked a fight with Dan Coopriders, Chris Coopriders father because he was installing security cameras that Mr. Bowling believed looked into his bedroom. See Exhibit A. And as indicated to the Court there

was a concern raised about child abuse which Plaintiff denied.

Questions about Plaintiff's use of AI AND GOOGLE searches are basic questions to determine how Plaintiff understands pregnancy, fertility, and miscarriage and to understand how she has faked pregnancies, manipulated timelines and invented different versions of events. The AI analysis of the 2025 pregnancy *was produced by the Plaintiff* and bated stamped Plaintiff 4607

3/21/2025 12:35 PM

iPhone



3/21/2025 12:35 PM

iPhone)

t My sister sent me this. According to The Internet, it's not uncommon for the heart rate to be in the 90s this early. ldkhe

Questions about menstruation tracking and how Plaintiff has tracked her cycles and pregnancies are central to the case. These were requested in discovery, and Plaintiff lied that she didn't track them. See Footnote 1. Plaintiff has bragged that she keeps track of her cycle to Jackie Samuelson. This is a standard question to pin Plaintiff down on the facts and to determine whether she is lying about the existence of evidence requested in discovery.

No one, other than Plaintiff can access her iCloud account. Information was provided to the Court showing that Plaintiff has 53 GB of text data on the cloud; it has been in pleadings. No one can access that data, except for Plaintiff, and both Plaintiff and Mr. Mitchell have slow-walked cooperation with the security process. Mr. Mitchell is aware that the two step security protocol in which he has actively participated does not work to access the data.

Questions about whether Plaintiff text messages with her mother, Mary Anna Ziarko, (who was present in the Plaintiffs house the night of April 5, 2025 and who apparently has no clue that Plaintiff was pregnant or miscarried that night) - establish spoliation are not grounds for an investigation. No text messages with Mary Anne Ziarko have been provided to COOPRIDER.

Plaintiff provided text messages with Yvonne Yakovich indicating that she **stalks** COOPRIDER on line (Exhibit B). For example, "at 215:4-8, Ms. Klein asks a leading question about a communication between Plaintiff and Yvonne Yakovich that we did not produce in discovery." The texts about scrubbing toilets **were in fact**

produced in discovery at Bates Stamp 5288 by Plaintiff and her attorney.

Yvonne

His Command will still have him reporting to work every day and they will probably give him remedial tasks like scrubbing toilets to pass him time

4/7/2025 8:58 PM (Read 4/7/2025 8:58 PM)

4/7/2025 8:58 PM

□□ to “ HAAAAHA that’s exactly what I said to my sister on the phone! She said they would be having him do bitch work, and I was like are they going to make him scrub the potty? ”

4/7/2025 8:58 PM

Yvonne

All of the extractions can be produced to Mitchell for his review. This will encompass the universe of data seen by Mr. Vasiliou, which is far larger than that provided to the Defense and will resolve his concerns while moving this case forward.

Mr. Vasiliou would like an Order directing him to whom to send the data. Mr. Vasiliou ceased all work, he has held his extraction including the artifacts provided to COOPRIDER and the mass of materials not provided to COOPRIDER, and he will provide the images in his possession to Array when Array is appointed by the Court in this case. He will not make any moves without an order to ensure that the Court’s intention is followed.

V. Plaintiff’s Continued Obstruction

Plaintiff has used the misunderstanding of the Order as an impediment to the appointment of Array, LLC and the ESI discovery process. Array billed for the extraction of Plaintiff’s computer and the postage for its return. Plaintiff has

refused to pay for any part of the bill. Array needs a new contract signed making the Mitchell Law Firm and Thompson Coe financially responsible for future work. Mr. Mitchell has ignored Array in finalizing the contract. He would not even provide a billing address. Without a contract in place and a Court appointment of Array, LLC, this case cannot move forward.

Plaintiff has raised frivolous objections to the ESI Request that must now be resolved by the Court. (Exhibit C) COOPRIDER requests that the Court conduct a discovery hearing and rule on Plaintiff's objections to the ESI so this case can get back on track and ready for trial. Mitchell should be given a deadline to review the data once received from Vasiliou and again from Array, LLC.

Plaintiff has not provided her 2nd phone to Array, LLC, and there is no assurances that this device is secure in the hands of Plaintiff. There may be a burner phone as well.

Plaintiff has not been willing to discuss protocols to access Plaintiff's iCloud.

All of these items must be resolved.

VI. What should happen now?

The following orders should be considered:

1. The Appointment of Array, LLC as the Court Appointed Forensics Expert.
2. Array, LLC requires a contract in place with Thompson Coe and Mitchell Law. The parties should finalize and sign this contract.
3. Payment of Plaintiff's share for the Array, LLC bill for extraction of

Plaintiff's computer and postage to return the computer.

4. An Order to Mr. Vasiliou to produce a copy of the entire extraction to Mr. Mitchell and an Order with a deadline for Mr. Mitchell to conduct his review and provide objections.

5. An Order to Mr. Vasiliou to produce the mirror images of Plaintiff's phone, and Defendant's phone and computers to Array, LLC, once appointed by the Court.

6. Orders resolving Plaintiff's ESI Objections.

7. An Order to Plaintiff to turn over all of her DEVICES as ordered on May 14, 2026 to Array, LLC.

8. A Certification by Plaintiff that she has provided all DEVICES.

9. An Order to Plaintiff to cooperate in the downloading of the 53 GB of text data on her iCloud, including being physically present with an investigator for the two step process under supervision.

10. An order to Array, LLC to conduct the ESI extractions on Plaintiff's DEVICES including the two known phones, any burner phones, her computer, and her iCloud.

11. General communication and destruction Orders.

A form of order addressing these issues is attached as Exhibit D.

These Orders would provide the Vasiliou extractions to Mr. Mitchell for his investigation and his review contemplated by the May 14, 2026 order. It puts the contracts and orders in place to permit this case to move forward on merits

discovery.

VII. Plaintiff failed to serve any discovery requests and provided no authority in his Motion to Compel without a pending discovery request.

There is no authority for an order compelling the production of documents without a proper request for production. Mr. Mitchell has cited no authority to the contrary. Plaintiff has not followed any protocol or order of this Court or the Federal Rules concerning Motions to Compel. No discovery rule was cited. No local rule was followed.

His first request demands all communications concerning Plaintiff's phone. "Defense Counsel to produce all of their communications relating to Ms. Plaintiff's iPhone or other devices or any data on those devices." The issues of Mr. Plaintiff's phone and her delayed and botched production despite multiple hearings since January 2026.

His second request is resolved with the May production of the Artifacts and the production of the extraction performed by Mr. Vasiliou.

No fees for a premature, unauthorized Motion to Compel based upon informal email demands – rather than requests for production of documents - are authorized by the Federal Rules.

VIII. Conclusion.

Plaintiff's counsel has jumped the procedural gun and filed a Motion to Compel without any pending request for production. He has demanded different documents over time and currently demands privileged communications and all privileged and work product communications going back to September 2025. None

of this is permitted by the Federal Rules. And no authority has been provided to support his document demands.

The Defense again apologizes for misreading the Court's order, and the Defense believes that the suggestions to move forward provided here will get this case back on track and ready for trial. There has been no prejudice to the Plaintiff, and Plaintiff has failed to show any. In the end, whether the Vasiliou extraction is reviewed by Mitchell, whether Array, LLC does another extraction which is reviewed by Mitchell, when Plaintiff produces her mirror image provided to NCIS, the outcome of the discovery production will be exactly the same. Plaintiff did not show malice or any intent to affront the court or willful disobedience at all. What is true is that both parties expected the extraction to proceed immediately, and the disclosure to the Defense was limited as stated.

The points for relief are set forth in the proposed order.

WHEREFORE, for the foregoing reasons, Defendant requests that the Court deny the relief requested by the Plaintiff and fashion remedies outlined in the proposed order.

Respectfully submitted,
WATTS LAW FIRM LLP

By: /s/ Mikal C. Watts

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CERTIFICATE OF SERVICE

I certify that on July 1, 2026 I SERVED the foregoing via ECF on all counsel of record.

/s/ Beth A. Klein
Beth A. Klein

CAUSE NO. _____

IN THE MATTER OF	§	IN THE JUSTICE COURT
	§	
	§	
Marshall Bowling, and	§	
Liana Davis	§	PRECINCT 2, PLACE 2
RESPONDENTS	§	
	§	
	§	NUECES COUNTY, TEXAS

APPLICATION FOR PEACE BOND

I, Applicant Danny Coopridner, submit this application for a Peace Bond to be posted by Respondents Marshall Bowling and Liana Davis. Applicant has reason to believe and does believe based upon specific recent behavior, acts, attempts, or threats which are specifically detailed below that Respondents have threatened to commit and are about to commit an offense against Applicant's person or property as described:

INCIDENT # 1: September 24, 2025 starting at approximately 07:08 p.m. (see video) Marshall Bowling made numerous threats and vulgarities, including:

07:09 p.m. *I know exactly where you live ...* 07:19 p.m. *Where's your wife at, back home by herself?*

07:10 p.m. *I'll find you ... away from this house.*

07:11 p.m. *I'll come find you.*

07: 11 p.m. *You better wipe that smile off your face.*

07:12 p.m. *I'll be in contact real soon.*

07:16 p.m. *I'll see you away from this house.*

07:17 p.m. *Fuck off and go fuck yourself douchebag.*

07:18 p.m. *Go back in your house before you get involved in something you shouldn't.*

07:18 p.m. *Shut the fuck up dude.*

Marshall also approached several times briskly in a physically intimidating manner. (see video at 07:10 p.m. and 07:18 p.m.)

Incident concluded at 07:19 p.m. with my returning to the garage where I'd been working before this began.

Corpus Christi Police called and arrived at 07:43 p.m. Report Number 2509039642. Officers V. Fabie (15223) and J. Unruh (19573). Police were shown the security cameras and their placement. They were explicitly asked if they saw any problem or anything illegal about the cameras and stated they are lawful.

Liana Davis, property owner, arrived at 07:45 p.m.

Marshall Bowling departed at 07:49 p.m.

CCPD concluded their interview with me and attempted to speak to Bowling who had already departed.

INCIDENT # 2: September 26, 2025 starting at approximately 03:12 p.m. (see video). Davis taking videos of security camera placements around the entirety of the property, including while I was working to tidy up the appearance. She has done this (taking videos) on numerous occasions while appearing to be talking with others at the same time. Our property, and indeed our safety, is already jeopardized by Davis and her filing of unfounded legal claims drawing national attention. This danger is what led to heightened security measures being installed. Now she is 'casing' the property to identify any spots where there may be vulnerabilities and apparently communicating those to others.

Corpus Christi Police were summoned (Report number 2509044433).

Address/Phone Number/Email of Respondents: 6329 Oso Parkway, Corpus Christi, TX 78414 / (512) 825-6430

Physical Description of Respondents:

Subject # 1: Marshall Bowling Sex: Male Age: 44 Height: 5' 9" Weight: 180 lbs.

Hair (*color & length*): Dark Medium length Eye Color: Unknown

Other identifying information: 2002-2006 White GMC Yukon XL, TX Lic: TLS 2087.

Relationship of Applicant to Respondent (*check one*):

☐ None ☐ Spouse ☐ Parent ☐ Friend ☐ Adult ☐ Child ☒ Neighbor

Subject # 2: Liana Davis Sex: Female Age: 37 Height: 5' 5" Weight: 120 lbs.

Hair (*color & length*): Blonde Medium length Eye Color: Unknown

Other identifying information: White Mitsubishi SUV.

Relationship of Applicant to Respondent (*check one*):

☐ None ☐ Spouse ☐ Parent ☐ Friend ☐ Adult ☐ Child ☒ Neighbor

Applicant's Signature

Date

6325 Oso Parkway, Corpus Christi, TX 78414 / (303) 378-8161

Address & Phone Number

dhcoopridr@gmail.com

Email

SWORN TO AND SUBSCRIBED before me on _____, 20____.

CLERK OF THE JUSTICE COURT OR NOTARY

5/14/2025 4:31 AM (Viewed 5/14/2025 4:32 AM)

Yvonne (7248587419)

♥ to "Happy happy birthday Yvonne! 🥳 🍰 🎉 🎁 "

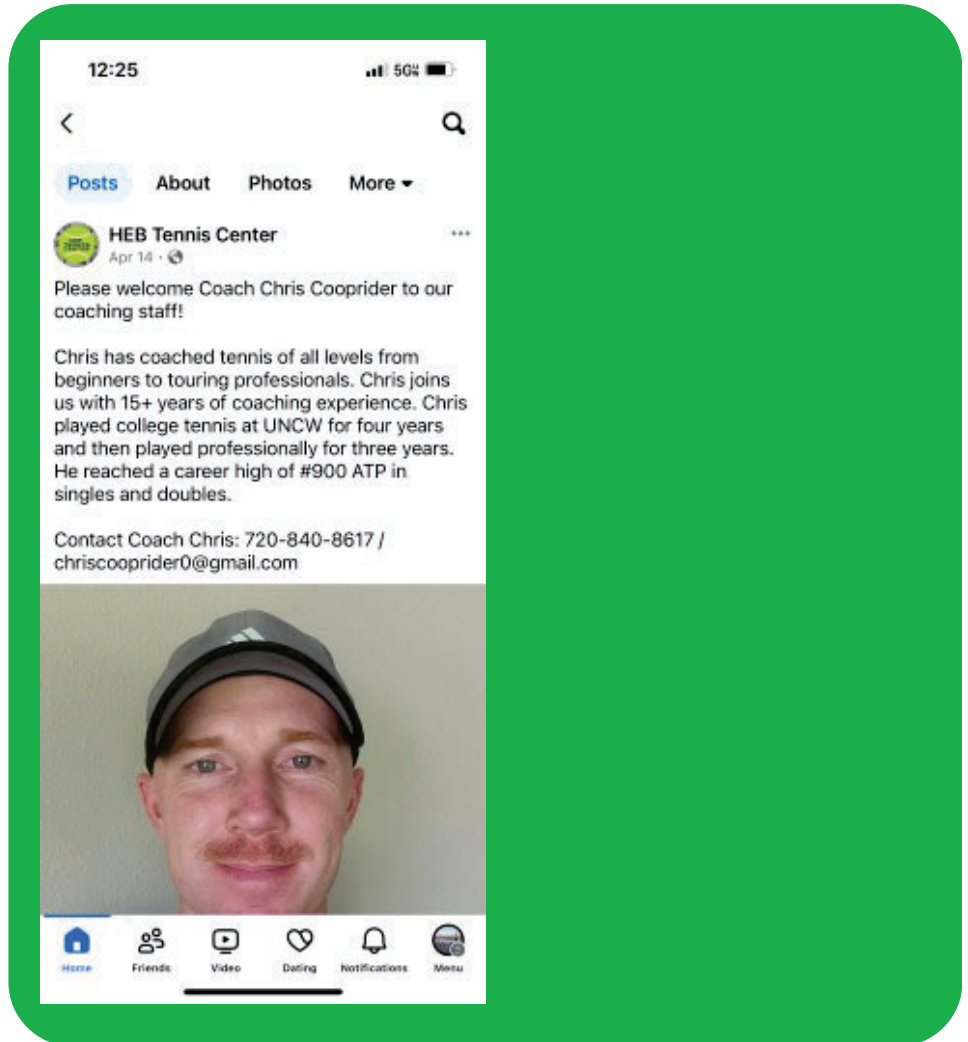
5/14/2025 4:32 AM

Yvonne (7248587419)

Thank you! 😊

5/15/2025 1:25 AM (Read 5/15/2025 4:49 AM)

iPhone (14122957136)



5/15/2025 1:25 AM (Read 5/15/2025 4:49 AM)

iPhone (14122957136)

Well, well, well. A former colleagues of mine who is an avid tennis player came across this Facebook post and sent it to me: Look who apparently got himself a 2nd job just days after finding out he's on a legal hold and will be in Corpus Christi indefinitely? I wonder if it was to stay busy and do something

productive in the wake of his ruined career, or to fund that expensive criminal defense attorney of his...maybe both.

5/15/2025 3:04 PM (Read 5/15/2025 3:28 PM)

iPhone (14122957136)

What's funny is, he's back to doing what he did for 7 years after graduating from college before joining the Marines (which he did in order to get on a long-term career path): Coaching tennis here and there.

5/16/2025 3:21 PM (Read 5/16/2025 3:25 PM)

iPhone (14122957136)

My hCG level is 3. Officially not pregnant anymore. No more weekly blood draws.

5/24/2025 5:02 AM (Read 5/24/2025 5:02 AM)

iPhone (14122957136)

Good morning everyone,

We have a few updates for the junior squads and the Tuesday live balls with Chris:

Monday, Wednesday, and Thursday Junior Programs will be coached by Ronald Elizondo

Tuesday Junior Programs will be coached by Daniel Pino

Tuesday Live Balls will be coached by Ronald Elizondo

3

Like

Comment

Send

Share



HEB Tennis Center

...

5/24/2025 5:02 AM (Read 5/24/2025 5:02 AM)

iPhone (14122957136)

Well this is interesting. Just a few weeks after Chris got hired as a coach by the HEB Tennis Center, it seems they quietly gave his classes away to other coaches. I am extremely curious as to why. Obviously, I'm secretly hoping it's because they somehow found out that he has potential criminal charges coming for a violent crime.

5/24/2025 5:07 AM

Yvonne (7248587419)

Or his Command found out and told him no

5/24/2025 5:07 AM (Read 5/24/2025 5:07 AM)

iPhone (14122957136)

Ah, that makes sense.

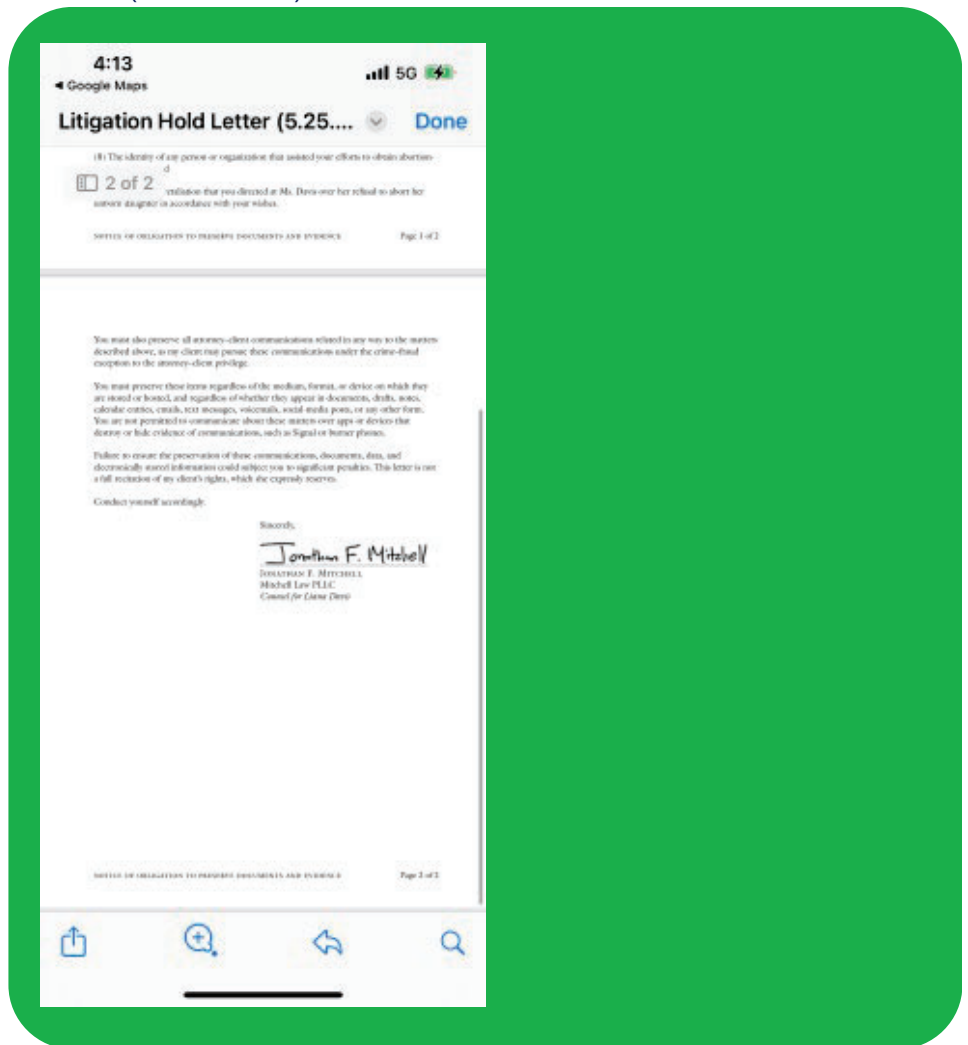
5/25/2025 4:15 PM (Read 5/25/2025 4:19 PM)

iPhone (14122957136)



5/25/2025 4:15 PM (Read 5/25/2025 4:19 PM)

iPhone (14122957136)



5/25/2025 4:15 PM (Read 5/25/2025 4:19 PM)

iPhone (14122957136)

This was served to Chris today. I have two different lawyers who have teamed up pro bono to go after Chris.

5/25/2025 4:22 PM (Read 5/25/2025 4:23 PM)

iPhone (14122957136)

Devin will be receiving the same letter maybe next week since he may have been involved. Please keep that on the down low.

5/26/2025 3:47 PM (Read 5/26/2025 3:59 PM)

iPhone (14122957136)

To clarify, these two lawyers are going after Chris in a civil suit while we wait on the criminal investigation to play out.

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

**Plaintiff Liana Davis's Objections and Responses to Defendant
Coopriders' Fourth Set of Requests for Production of Documents**

Plaintiff Liana Davis ("Ms. Davis" or "the plaintiff") responds to defendant Christopher Coopriders' ("Mr. Coopriders" or "the defendant") fourth set of requests for production.

PRELIMINARY STATEMENT

Discovery in this matter remains ongoing and will continue as long as permitted by statute, stipulation, or court order. Ms. Davis has not completed her investigation and trial preparation. Therefore, all of the following responses and any corresponding production of documents are given without prejudice to the right of Ms. Davis to introduce documents or information discovered or deemed responsive after the date of these responses and/or any corresponding production of documents, if any, and to rely upon any and all such documents or information at trial or otherwise. Further, Ms. Davis reserves the right to assert any objections that her continued review of documents after the date this response indicates is appropriate.

Ms. Davis also objects and responds to the requests based upon her best, good-faith understanding and interpretation of each Request. Accordingly, if Mr. Coopriders

subsequently assert a different interpretation than that presently understood by Ms. Davis, Ms. Davis reserves the right to supplement or amend these responses and objections.

Ms. Davis makes these responses subject to and without waiving (a) Ms. Davis's right to object to Mr. Coopriders use of incomplete or unauthenticated information that Mr. Coopriders may derive from these responses; (b) the objections stated here or below with respect to attorney-client privilege, work-product immunity, lack of relevance or materiality, or any other ground set forth; (c) Ms. Davis's right to object to the use of the responses for any purpose, in whole or in part, in any subsequent step or proceeding in this action or any other action; (d) Ms. Davis's right to object on any and all grounds, at any time, to other discovery requests involving or relating to the subject matter of these requests; and (e) Ms. Davis's right at any time to revise, correct, add to, or clarify any of the responses made herein. The inadvertent disclosure of any privileged information shall not be deemed to waive any applicable privilege with respect to such information or any other information.

Finally, Ms. Davis's responses to the requests do not constitute admissions or acknowledgements that the documents sought are within the proper scope of discovery. Nor shall a statement that documents will be produced constitute an admission that such documents actually exist. Instead, it shall mean only that, if responsive documents exist and survive the general and specific objections, they will be produced. Likewise, an objection to producing documents does not mean that documents otherwise responsive to a particular demand in fact exist.

GENERAL OBJECTIONS

Ms. Davis's responses to each of the requests are subject to each of the following general objections:

A. Privileged or Protected Material. Ms. Davis objects to each request on the grounds, and to the extent, that it seeks information: (a) that is protected from discovery pursuant to the attorney-client privilege and/or the attorney work-product doctrine; (b) that was prepared in anticipation of litigation; (c) that is a trade secret or confidential or proprietary information; and/or (d) that is otherwise protected from disclosure under any statutory or common-law privilege or protection. Specifically, Ms. Davis objects to producing, and will withhold, otherwise discoverable documents that are sensitive in nature to the extent that a protective order restricting disclosure of such documents has not been entered.

B. Privacy Rights. Ms. Davis objects to each request on the grounds, and to the extent, that it seeks information that contains confidential and/or private information of a third party, or the confidential and/or private information of Ms. Davis, or the joint confidential and/or private information of Ms. Davis and a third party.

C. Instructions and Definitions. Ms. Davis objects to the instructions and definitions on the grounds, and to the extent, that such instructions and definitions are inconsistent with or require Ms. Davis to provide responses or documents that are beyond the scope of the applicable rules of civil procedure, other applicable procedural rules, and/or case law. Ms. Davis objects to the defined terms on the ground that the definitions are so expansive as to purport to seek information beyond that allowed by applicable rules.

D. Relevance. Ms. Davis objects to each request to the extent it seeks information, communications, or documents that are not relevant to any party's claim or defense, as required by Federal Rule of Civil Procedure 26(b)(1).

E. Proportionality. Ms. Davis objects to each request to the extent it seeks information, communications, or documents that are not proportional to the needs of the case, as required by Federal Rule of Civil Procedure 26(b)(1).

F. Annoyance, Harassment or Oppression. Ms. Davis objects to each request on the grounds, and to the extent, that it will cause undue annoyance, embarrassment, harassment, or oppression.

G. Overbreadth and Undue Burden. Ms. Davis objects to each request to the extent it is overbroad, unduly burdensome, or disproportionate to the needs of the case within the meaning of Federal Rule of Civil Procedure 26(b)(1). Many of the requests seek “all” documents and communications on exceedingly broad topics, without meaningful limitation as to time, scope, or subject matter, and would impose costs and burdens on Ms. Davis that far outweigh any likely benefit. Ms. Davis will construe such requests reasonably and respond to the extent the requests seek information proportional to the needs of the case.

H. Vagueness and Ambiguity. Ms. Davis objects to each request to the extent it is vague, ambiguous, or susceptible to multiple interpretations. Where Ms. Davis has responded to any such request, she has done so based on a reasonable interpretation, which Ms. Davis will identify where appropriate.

I. Information Otherwise Available. Ms. Davis objects to each request on the grounds, and to the extent, that it seeks information readily accessible to Mr. Coopridier or contained in publicly available material, a matter of public record, or already in Mr. Coopridier’s files.

J. Information Not in Plaintiff’s Possession. Ms. Davis objects to each request on the grounds, and to the extent, that the information sought is not within the possession, custody, or control of Ms. Davis.

K. Definitions. Ms. Davis objects to the definition of “YOU” and “YOUR” to the extent it includes or refers to “two hidden emails on iCloud.” Ms. Davis does not have “hidden” e-mails or e-mail accounts, and the reference is unacceptably vague in any event. Ms. Davis will construe “YOU” and “YOUR” to extend no further than

plaintiff Liana Davis, the cell phone number (412) 295-7136, the e-mail account liana_webster@att.net.

L. Discovery Requests Tainted By Mr. Coopriders' Attorneys' Unauthorized Access To Ms. Davis's Cell Phone. Mr. Coopriders' lawyers have already accessed data and information on Ms. Davis's iPhone in violation of this Court's order of May 14, 2026, which prohibited them from accessing data or information on Ms. Davis's iPhone or other devices absent an order of the Court. Ms. Davis will be seeking a remedy from this Court to prohibit Mr. Coopriders and his legal team from using or relying in any way on this illegally obtained evidence. Ms. Davis objects to any discovery request that is tainted in any manner by the misconduct of Mr. Coopriders' attorneys and their unlawful access to the data and information on Ms. Davis's iPhone, and she objects to any discovery request that seeks data or information that Mr. Coopriders' lawyers previously obtained from her iPhone or other devices in violation of the Court's order of May 14, 2026.

M. Reservation of Rights. Ms. Davis reserves all objections, privileges, and rights not expressly stated herein, including but not limited to objections based on relevance, privilege, and proportionality. The assertion of any specific objection to a particular request does not constitute a waiver of any other objection or ground for withholding documents.

SPECIFIC OBJECTIONS

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Many of these requested documents and communications will not have any relevance to the parties' claims or defenses, and many others will not be

proportional to the needs of the case. Mr. Coopriders attorneys are not entitled to view all communications or documents that contain one or more of the words or phrases unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION NO. 2: Produce all DEVICES for extraction of all COMMUNICATIONS in native format between YOU and YVONNE YAKOPOVICH Cell phone number 724-858-7149 from 4/1/2025 to the present.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because she has already produced all text messages between herself and Yvonne Yakopovich that are both relevant a party's claim or defense and proportional to the needs of the case. So Mr. Coopriders demand for these text messages in native format is unreasonably cumulative or duplicative under Rule 26(b)(2)(C). Ms. Davis further objects to this request because many of her communications with Yvonne Yakopovich will not have any relevance to the parties' claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopriders attorneys are not entitled to view all of Ms. Davis's communications with Ms. Yakopovich unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications with Ami Amoroso will not have any relevance to the parties' claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopriders attorneys are not entitled to view all of Ms. Davis's communications with Ms. Amoroso unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because there is no person named “Anna Ziarno” with whom she has ever communicated. If Mr. Coopridner wishes to discover all of Ms. Davis’s communications with Mary Anna Ziarko, as opposed to “Anna Ziarno,” then Ms. Davis objects because many of her communications with Ms. Ziarko will not have any relevance to the parties’ claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopridner’s attorneys are not entitled to view all of Ms. Davis’s communications with Ms. Ziarko unless Ms. Davis’s attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications with Jana Pinson will not have any relevance to the parties’ claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopridner’s attorneys are not entitled to view all of Ms. Davis’s communications with Ms. Pinson unless Ms. Davis’s attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications with the Pregnancy Center of Coastal Bend will not have any relevance to the parties’ claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopridner’s attorneys are not entitled to view all of Ms. Davis’s communications with the Pregnancy Center of Coastal Bend unless Ms. Davis’s attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION NO. 7: Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and MARK LEE DICKSON from 1/1/2025 to the present.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications with Mark Lee Dickson will not have any relevance to the parties' claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopriders' attorneys are not entitled to view all of Ms. Davis's communications with Mr. Dickson unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications with Kristy Loesel will not have any relevance to the parties' claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopriders' attorneys are not entitled to view all of Ms. Davis's communications with Ms. Loesel unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION NO. 9: Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and ROMY SATERY from 1/1/2025 to the present.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications with Romy Satery will not have any relevance to the parties' claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopriders' attorneys are not entitled to view all of Ms. Davis's communications with Ms. Satery unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because many of her communications between 5:00 A.M. on April 4, 2025, and midnight on April 7, 2025, will not have any relevance to the parties' claims or defenses, and many others will not be proportional to the needs of the case. Mr. Coopriders' attorneys are not entitled to view all of Ms. Davis's communications between 5:00 A.M. on April 4, 2025, and midnight on April 7, 2025, unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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 Coopriders (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"

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because the request for internet searches is not limited in time, and will therefore include internet searches that will not have any relevance to the parties' claims or defenses, and many others that will not be proportional to the needs of the case. Mr. Coopriders' attorneys are not entitled to view all of Ms. Davis's internet searches on the listed topics that reach before the time Ms. Davis and Mr. Coopriders met, and Ms. Davis's attorneys must be given an opportunity to review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION NO. 12: Produce all DEVICES for retrieval and extraction of your location data for 4/1/2025 to 4/7/2025.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because Ms. Davis's location between April 1, 2025, and April 7, 2025, has no relevance to the parties' claims or defenses and is not proportional to the needs of the case. Ms. Davis's attorneys must be given an opportunity to her location data to determine their relevance and proportionality before any such data are produced.

REQUEST FOR PRODUCTION NO. 13: Produce all DEVICES for retrieval and extraction of audio recordings of YOU having sex with Defendant.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because she has no responsive audio recordings on her devices or in her possession, custody, or control. Ms. Davis further objects to this request because the sought-after recordings have no relevance to the parties' claims or defenses and are not proportional to the needs of the case. Ms. Davis further objects to this request because it subjects Ms. Davis to annoyance, embarrassment, oppression, or undue burden or expense. See Fed. R. Civ. P. 26(c)(1). Ms. Davis's attorneys must be given an opportunity to review these recordings for relevance and proportionality before any such recordings are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because it seeks to extract "all audio and video recordings you made on April 5 and April 6, 2025," which will include recordings that have no relevance to the parties' claims or defenses and are not proportional to the needs of the case. Ms. Davis further objects to this request because she has already produced all audio recordings that she made of Mr. Coopridge while he was at her house on the night of the murder, so this request is unreasonably cumulative or duplicative under Rule 26(b)(2)(C). Ms. Davis's attorneys must be given an opportunity to review these recordings for relevance and proportionality before any such recordings are produced.

REQUEST FOR PRODUCTION NO. 15: Produce all DEVICES for an analysis of data deletion, data loss, and data movement since 1/1/2025.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request to the extent it seeks production of "all devices," including devices that do not contain any data or information relevant to this case, such as computers owned by her place of employment, which Ms. Davis has "used" between January 1, 2025, and the present but which do not contain data or information relevant to this case. Ms. Davis further objects to this request because information related to "data movement" has no relevance to the claims or defenses in this case, and moving data is not spoliation of evidence.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request to the extent it seeks information from menstruation, fertility and/or sexual activity tracking apps that has no relevance to the parties' claims or defenses, or that will not be proportional to the needs of the case.

REQUEST FOR PRODUCTION NO. 17: Produce all DEVICES for an analysis of a work out tracking apps for the dates 1/1/2025 to 4/5/2025.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request to the extent it seeks information from work out tracking apps that has no relevance to the parties' claims or defenses, or that will not be proportional to the needs of the case. Mr. Coopriders attorneys are not entitled to view all data and information on Ms. Davis's work-out tracking apps unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

REQUEST FOR PRODUCTION 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.

RESPONSE: Ms. Davis incorporates by reference the preliminary statement and general objections. Ms. Davis further objects to this request because it seeks "all" voice memos, notes, calendar events, and reminders created between 1/1/2025 and 5/1/2025, which will include voice memos, notes, calendar events, and reminders that have no relevance to the parties' claims or defenses, and many others that will not be proportional to the needs of the case. Mr. Coopriders attorneys are not entitled to view all voice memos, notes, calendar events, and reminders unless Ms. Davis's attorneys review them to determine their relevance and proportionality and ensure that no privileged communications or documents are produced.

Ms. Davis further objects to this request because Mr. Coopriders lawyers have already accessed the notes on Ms. Davis's iPhone in violation of this Court's order of May 14, 2026, which prohibited them from accessing data or information on Ms. Davis's iPhone absent an order of the Court. Ms. Davis will be seeking a remedy from this Court to prohibit Mr. Coopriders from using or relying in any way on this illegally obtained evidence.

Respectfully submitted.

/s/ Jonathan F. Mitchell
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jonathan@mitchell.law

Dated: June 12, 2026

Counsel for Plaintiff Liana Davis

CERTIFICATE OF SERVICE

I certify that on June 12, 2026, I served this document by e-mail upon:

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

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, et al.	*	
Defendants.	*	

PROPOSED ORDER

1. Array, LLC is appointed as the Court Appointed Forensics Expert.
2. As Array, LLC requires a contract in place with Thompson Coe and Mitchell Law, PLLC, the law firms will finalize and sign this contract within a week of this Order.
3. Plaintiff shall pay 50% of the Array, LLC bill for extraction of Plaintiff's computer and postage to return the computer within 7 days of this Order.
4. Mr. Vasiliou shall produce a copy of the entire extraction of the Davis iPhone to Mr. Mitchell within 7 days of this order. Mr. Mitchell shall conduct his review and provide objections within 21 days of receipt of the extraction.
5. Mr. Vasiliou shall produce the mirror images of Plaintiff's phone, and Defendant's phone and computers to Array, LLC within 7 days of this Order.
6. Plaintiff shall turn over all of her DEVICES as ordered on May 14, 2026 to Array, LLC. DEVICES are defined per the May 14, 2026 Order as I-phone, all phones used between 1/1/2025 and the present and all computers Davis has used between 1/1/2025 and the present and iCloud remote storage within 7 days of this

Order.

7. A written Certification by Plaintiff that she has provided all DEVICES to Array, LLC is due within 7 days of this Order.

8. Plaintiff shall fully and timely cooperate in the downloading of the 53 GB of text data on her iCloud, including being physically present with an investigator for the two step download process under supervision.

9. The Defendant's ESI Request shall be provided to Array, LLC within 7 days of this Order by a joint email. Array shall conduct the ESI extractions on Plaintiff's DEVICES including the two known phones, any burner phones, her computer, and her iCloud within 30 days of receipt. Mr. Mitchell will be provided the extraction and will complete his review within 21 days of receipt of the extraction. Should the Plaintiff serve and ESI request on Defendant, the Defense will have 30 days to object to the request, and any extraction will proceed only upon an order of the Court.

10. General communication and destruction Orders are as follows:

a. Array LLC will report directly to the Court and will secure and securely hold the data evidence as a custodian for the duration of the case or until the Court releases it.

b. At the conclusion of the case, which is defined as either: (a) the moment a final judgment or final decision of this Court becomes final either by the conclusion of appellate review or when the time for seeking appellate review expires; or (b) the moment at which the parties dismiss all pending claims and/or

counterclaims as part of a settlement or a voluntary withdrawal of the claims, Array LLC will destroy all of the data evidence and passwords and will provide a certification of destruction.

c. Counsel for the parties may only jointly communicate with Array, LLC about scheduling the transfer of data from George Vasiliou, arranging for the collection of electronic devices or other procedural matters related to the transfer of data or collection of electronic data, contract and payment terms, and payments.

d. Array, LLC may examine or search the data evidence only upon receipt of a signed ESI Order from the Court. Array, LLC shall notify the Court and All Counsel before examining or searching any of the data evidence pursuant to a signed ESI order of the Court.

e. Array, LLC shall provide extractions from Plaintiffs devices to Plaintiff's counsel for review before producing the extraction to opposing counsel. Array, LLC shall provide extractions from Defendants Devices to Defendants counsel for review before producing the extraction to opposing counsel. Each side shall have 21 days to complete any review and make objections from the date of receipt of the extraction.

By the Court
