

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.

**NONPARTY MARY ANNA ZIARKO'S MOTION TO QUASH
SUBPOENA**

On July 3, 2026, Mr. Coopriders's attorneys subpoenaed Mary Anna Ziarko to testify at a deposition. *See* Exhibit 4. The subpoena ordered Ms. Ziarko to bring to the deposition:

All text messages, email messages, and voice mails between you & Liana Davis from January 1, 2025 to the present that concern Liana Davis's pregnancies in 2025 and 2026, Christopher Coopriders, the events of April 5–6, 2025, Marshall Bowling, Jeffrey Sparks, abortion medication, & this lawsuit.

Id. Ms. Ziarko is plaintiff Liana Davis's 78-year-old mother who is disabled and in frail health. *See* Ziarko Decl. ¶¶ 4–11 (attached as Exhibit 1). She cannot drive and lives only on Social Security and a small pension. *See id.* ¶ 12. Ms. Davis has kept her pregnancy with Coopriders, the murder, and the lawsuit secret from her mother because she fears that informing her mother of these facts would devastate her and jeopardize her health given her mother's history of stroke and high blood pressure. *See* Davis Decl. ¶ 8; Davis Dep. Tr., ECF No. 86, at 62:8–63:24.

Mr. Coopriders's attorneys know this, as Ms. Davis testified to these facts at her deposition. *See id.* Ms. Davis's attorney also reiterated these facts to Mr. Coopriders's

legal team in an e-mail sent on June 14, 2026, and he warned them that he would move to quash if they subpoenaed Ms. Ziarko. *See* E-mail from Jonathan F. Mitchell of June 14, 2026 (attached as Exhibit 5); Mitchell Decl. ¶ 5 (attached as Exhibit 3) (authenticating the e-mail). Mr. Coopriders attorneys issued the subpoena anyway.

The Court should quash the subpoena to testify because it subjects Ms. Ziarko to undue burden. *See* Fed. R. Civ. P. 45(d)(3)(A)(iv) (requiring courts to quash or modify a subpoena that “subjects a person to undue burden”). The subpoena to testify unduly burdens Ms. Ziarko for many reasons. First, Ms. Ziarko has no knowledge of Ms. Davis’s pregnancy with Mr. Coopriders or the alleged murder of her granddaughter apart from this lawsuit, so a deposition of Ms. Ziarko will not reveal information relevant to any party’s claim or defense. Second, Ms. Davis has intentionally concealed the murder and her pregnancy with Coopriders from her elderly mother because she fears that disclosing this information would traumatize and potentially harm Ms. Ziarko given her advanced age and frail health. Third, none of the facts regarding Ms. Ziarko’s role on the morning of April 6, 2025, are in dispute. Mr. Coopriders does not deny that Ms. Davis purchased an Uber for Ms. Ziarko to come to her house shortly after Coopriders abandoned her after midnight on April 6, 2025. Nor does Mr. Coopriders deny that Ms. Ziarko stayed at Ms. Davis’s house while Ms. Davis was taken to the emergency room. Fourth, Ms. Ziarko is disabled and cannot drive. She lives on social security and requiring her to pay for transportation from her apartment to downtown Corpus Christi for a deposition will impose financial hardship.

The subpoena’s demands for Ms. Ziarko’s “text messages, email messages, and voice mails” with Ms. Davis should also be quashed as unduly burdensome. Mr. Coopriders attorneys can obtain the sought-after text messages and email messages from Ms. Davis’s devices, which have already been turned over for forensics imaging. There is no need for Mr. Coopriders attorneys to harass an elderly, sick, and disabled woman for data that is easily obtainable from Ms. Davis’s iPhone and computer.

BACKGROUND

During Ms. Davis's deposition of May 28, 2026, Ms. Klein repeatedly questioned Ms. Davis about her communications with her mother, Mary Anna Ziarko. *See* Davis Dep. Tr., ECF No. 86, at 62:8–63:24. In response to these questions, Ms. Davis insisted that her elderly mother knew nothing of her pregnancy with Mr. Coopriider, the murder of her granddaughter, or the wrongful-death lawsuit that Ms. Davis has filed against Mr. Coopriider. Ms. Davis also explained that she intentionally concealed this information to protect her mother from trauma that could jeopardize her already frail health:

Q. Have you turned over all of your communications with Anna Ziarko?

A. I'm assuming that's supposed to say my mother, her name is Mary Anna Ziarko, and there are absolutely no relevant communications with her. She is largely unaware of what took place and what's currently taking place, to my knowledge.

Q. When did you let your mom know that you were pregnant in the spring of 2025?

MR. MITCHELL: Objection, form.

A. My mother is not aware, to my knowledge, that I was ever pregnant in the spring of 2025.

Q. When you asked your mom to come over on the night of April 5th and 6th, did you tell her that you were miscarrying?

A. No, I did not, only that I needed to go to the hospital and I needed her to come quickly. . . .

Q. Did you ever tell her why you had to go to the hospital?

A. No. She is not aware. To my knowledge, she does not know what happened. I know this might be a surprise. My mother is not aware that I was pregnant, she doesn't know about the murder, she doesn't know about my federal civil suit. She only knows about my divorce and custody case.

Q. Why are you keeping her in the dark?

MR. MITCHELL: Objection, form.

A. She's 78 years old with a history of stroke. She has high blood pressure. I am her only child, really her only immediate family. I have deep concerns for her health and how that would affect her at her age.

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, Coopriders, the murder, none of it.”).

On June 14, 2026, Ms. Klein e-mailed Mr. Mitchell and told him that she intended to subpoena Ms. Ziarko and force her to sit for a deposition. Later that day, Mr. Mitchell e-mailed Ms. Klein and warned her not to subpoena Ms. Ziarko given her lack of knowledge of anything relevant to the case, her advanced age, and her many illnesses. Mr. Mitchell wrote:

Counsel:

If you issue subpoenas to depose either Ms. Amoroso or Ms. Ziarko, then we will move to quash the subpoenas and seek protective orders. Neither of these individuals has information or knowledge relevant to the case, and your efforts to depose family members of Ms. Davis who have no knowledge of Coopriders' actions is an act of harassment.

Ms. Davis testified that her mother knows nothing about her pregnancy with Coopriders or the alleged murder, and Ms. Davis concealed the pregnancy and the death of her unborn child from her elderly mother because “[s]he's 78 years old with a history of stroke. She has high blood pressure. I am her only child, really her only immediate family. I have deep concerns for her health and how that would affect her at her age.” Davis Dep. 63:21–24.

Your insistence on deposing a frail, 78-year-old woman who has no knowledge of this lawsuit or what happened to her daughter is nothing short of cruelty. The deposition will reveal devastating information about her murdered granddaughter that Ms. Davis has kept from her mother for the sake of her health and well-being. Please reconsider your decision to seek this deposition.

E-mail from Jonathan F. Mitchell (June 14, 2026) (attached as Exhibit 5). Despite Mr. Mitchell's plea, Ms. Klein went ahead and issued a subpoena to Ms. Ziarko on July 3, 2026.

THE SUBPOENA SUBJECTS MS. ZIARKO TO UNDUE BURDEN

The Court should quash the subpoena because it will impose severe burdens on Ms. Ziarko that cannot be justified when Ms. Ziarko lacks knowledge of any relevant facts and when the sought-after documents and communications can be easily obtained from Ms. Davis.

I. MS. ZIARKO IS A FRAIL, ELDERLY WOMAN IN EXCEEDINGLY POOR HEALTH AND DIRE FINANCIAL STRAITS

Ms. Ziarko is 78 years old and will turn 79 on August 11, 2026. *See* Ziarko Decl. ¶ 4 (attached as Exhibit 1). She is disabled and unable to drive. *See id.* at ¶ 5. Ms. Ziarko has collected Social Security Disability benefits. Ms. Ziarko first became disabled when she suffered a pelvic separation while giving birth to Ms. Davis in 1988, which left her unable to drive. She can walk only with a cane and very slowly on account of a stroke that occurred in 2011. *See id.*

Ms. Ziarko suffers from fibromyalgia, a painful and chronic nerve condition that causes widespread musculoskeletal pain, fatigue, sleep disturbances, and cognitive difficulties. *See id.* at ¶ 6. In addition to her fibromyalgia, Ms. Ziarko suffers from severe arthritis. *See id.* at ¶ 7. She lives in constant pain every day of her life. *See id.*

More recently, Ms. Ziarko has been afflicted with a stomach infection as well as severe anemia, which required her to undergo a blood transfusion earlier this year because her iron was critically low. *See id.* at ¶ 8. This has left Ms. Ziarko in an exceedingly weakened state. *See id.* Ms. Ziarko also has a history of strokes and high-blood-pressure issues that could lead to another stroke. *See id.* at ¶ 9. She is no condition to withstand a deposition that could last for as long as seven hours. *See id.* at ¶ 10. It is difficult for Ms. Ziarko to sit for anything and recently she wasn't even

feeling well enough to attend a birthday party at Ms. Davis's home. *See id.* at ¶ 11. Ms. Davis is seriously concerned that her mother could die from being subjected to the stress and strain of a deposition conducted by Mr. Coopriders's attorneys, as well as the trauma of learning that she had a previously unknown granddaughter who was murdered in the womb. *See* Davis Decl. ¶ 9.

Ms. Ziarko is also in exceedingly difficult financial straits. Her only sources of income are Social Security and a small pension. And because she cannot drive, she must budget for transportation to choose which doctor's appointments she can afford to travel to. *See* Ziarko Decl. ¶ 12. On the night of the murder, Ms. Davis had to send Ms. Ziarko \$25.00 through Venmo before Ms. Ziarko could order an Uber because Ms. Ziarko could not afford to pay for an Uber with her own money. Forcing Ms. Ziarko to arrange and pay for travel to and from the deposition will impose financial hardship. *See id.*

II. THE SOUGHT-AFTER DEPOSITION UNDULY BURDENS MS. ZIARKO BECAUSE SHE HAS NO KNOWLEDGE OF ANY RELEVANT AND DISPUTED FACT AND DISCLOSING THE DEATH OF HER CURRENTLY UNKNOWN GRANDDAUGHTER WILL TRAUMATIZE MS. ZIARKO AND JEOPARDIZED HER HEALTH

Forcing Ms. Ziarko to sit for a deposition will unduly burden her because she has no knowledge or awareness of any fact relevant to whether Mr. Coopriders murdered Ms. Davis's unborn child with abortion pills. Ms. Davis concealed the pregnancy and the alleged murder from Ms. Ziarko on account of her age and frail health, and Ms. Ziarko has no knowledge of Mr. Coopriders or whether he poisoned Ms. Davis with misoprostol. *See* Davis Decl. ¶¶ 8, 10. Ms. Ziarko was not even aware of this lawsuit until she was served with the subpoena from Mr. Coopriders's attorneys. *See* Ziarko Decl. ¶ 13.

Ms. Ziarko's only involvement in this case comes from the fact that Ms. Davis called her in desperation on 12:10 A.M. on April 6, 2026, and asked her to come to

her house to stay with her children while Ms. Davis went to the emergency room. *See* Complaint, ECF No. 1, at ¶ 54. But Mr. Cooprider is not disputing that Ms. Ziarko came to Ms. Davis's house to look after her children on the morning of April 6, 2026. Nor is Cooprider denying that Ms. Davis purchased an Uber for Ms. Ziarko when Cooprider failed to show up at Ms. Ziarko's house. Ms. Ziarko has no knowledge of any relevant and disputed fact that could justify subjecting her a deposition, especially in her current condition.

III. THE DEMANDS FOR DOCUMENTS AND COMMUNICATIONS UNDULY BURDEN MS. ZIARKO BECAUSE THE SOUGHT-AFTER DOCUMENTS AND COMMUNICATIONS CAN BE OBTAINED FROM MS. DAVIS'S DEVICES

The subpoena also demands that Ms. Ziarko produce “text messages, email messages, and voice mails between you & Liana Davis.” Exhibit 4. This imposes an undue burden on Ms. Ziarko because Mr. Cooprider's attorneys can obtain all of the requested text messages and e-mails from Ms. Davis's devices, which she has already turned over to Array LLC for forensics imaging. *See* Davis Decl. ¶ 11. In addition, Ms. Davis has never left any voicemails with Ms. Ziarko that “concern Liana Davis's pregnancies in 2025 and 2026, Christopher Cooprider, the events of April 5–6, 2025, Marshall Bowling, Jeffrey Sparks, abortion medication, & this lawsuit.” *See* Davis Decl. ¶ 12. Ms. Davis rarely leaves voicemails with her mother because Ms. Ziarko almost always answers the phone when Ms. Davis calls, and Ms. Davis has never left her mother any voicemails pertaining to any of the topics listed in Mr. Cooprider's subpoena. *See id.* These demands are nothing short of harassment, and they should be quashed alongside the unwarranted deposition demand.

* * *

Mr. Cooprider's attorneys know full well that Ms. Ziarko is elderly, disabled, and in exceedingly frail health, and that Ms. Davis has never communicated with her

mother about Mr. Cooprider, her pregnancy with Mr. Cooprider, or the alleged murder that occurred in April 2025. Their insistence on deposing Ms. Ziarko with full knowledge of these facts is abusive and cruel. The Court should quash the subpoena.

CONCLUSION

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

Respectfully submitted.

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

Dated: July 25, 2026

Counsel for Nonparty Mary Anna Ziarko

CERTIFICATE OF SERVICE

I certify that on July 25, 2026, I served this document through CM/ECF upon:

MIKAL C. WATTS
Watts Law Firm LLP
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Counsel for Defendant Christopher Coopridier

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Counsel for Nonparty Mary Anna Ziarko

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 MARY ANNA ZIARKO

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

4. I am 78 years old and will turn 79 on August 11, 2026.

5. I have been disabled and unable to drive for nearly 40 years. I became disabled in 1988 when I suffered a three-centimeter pelvic separation while giving birth to Liana, which left me unable to drive. I can walk only with a cane and very slowly. I have used a cane on account of a stroke that I suffered in 2011. I have collected Social Security Disability benefits.

6. I am currently suffering from fibromyalgia, a painful and chronic nerve condition that causes widespread musculoskeletal pain, fatigue, sleep disturbances, and

cognitive difficulties. I also suffer from a separate and severe sleep disorder that was recently diagnosed.

7. In addition to the fibromyalgia, I am also suffering from severe arthritis. These conditions leave me in constant pain every day.

8. More recently, I have been afflicted with a stomach infection as well as severe anemia, which required me to undergo a blood transfusion earlier this year because my iron was critically low. This has left me in an exceedingly weakened state.

9. I also have a history of strokes and high blood pressure. My blood pressure can get very high and cause strokes, especially in a stressful and potentially traumatic situation such as a deposition.

10. I am not in a condition to travel to and sit for a deposition that could last for as long as seven hours. It could possibly give me another scope.

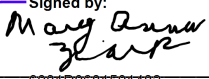
11. It is difficult for me to sit for anything. Recently, I wasn't feeling well enough to attend a birthday party at Liana's home.

12. I am also in difficult financial straits. My only sources of income are Social Security and a small pension. Because I cannot drive, I must budget for transportation to choose which doctor's appointments I can afford to travel to. Paying for travel to and from the deposition will impose financial hardship.

13. I was not even aware of this lawsuit until I was served with the subpoena.

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: 7/25/2026

Signed by:

6081D0681501482...
MARY ANNA ZIARKO

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 motion to quash the subpoena that was served on my mother, Mary Anna Ziarko.

4. My mother is 78 years old, disabled, and in exceedingly frail health.

5. She is currently suffering from fibromyalgia, a painful and chronic nerve condition that causes widespread musculoskeletal pain, fatigue, sleep disturbances, and cognitive difficulties. She also suffers from severe arthritis. These conditions leave her in constant pain every day of her life.

6. More recently, my mother has been afflicted with a stomach infection as well as severe anemia, which required her to undergo a blood transfusion earlier this year because her iron was critically low. She also has a history of strokes and high blood pressure.

7. My mother is in no condition to travel to and sit for a deposition that could last for as long as seven hours.

8. I have intentionally concealed my pregnancy with Mr. Cooprider and the death of our daughter from my mother, because I do not wish to traumatize her by telling her that she has a previously unknown granddaughter who was murdered by her own father. I am worried that revealing these facts would jeopardize her health and even her life given the especially frail condition that she is currently in.

9. I am seriously concerned that my mother could die from being subjected to the stress and strain of a deposition conducted by Mr. Cooprider's attorneys, as well as the trauma of learning that she had a previously unknown granddaughter who was murdered in the womb.

10. To the best of my knowledge, my mother knows nothing about Mr. Cooprider or whether he poisoned me with misoprostol. I have not even told my mother about this lawsuit.

11. The subpoena that Mr. Cooprider's attorneys served on my mother demands that she produce "text messages, email messages, and voice mails between you & Liana Davis." All of the requested text messages and email messages can be obtained from my devices, which I have turned over to Array. I have not deleted any text messages or emails that were exchanged between my mother and me on or after January 1, 2025.

12. I have never left any voicemails with my mother that "concern Liana Davis's pregnancies in 2025 and 2026, Christopher Cooprider, the events of April 5–6, 2025, Marshall Bowling, Jeffrey Sparks, abortion medication, & this lawsuit." I rarely leave voicemails with my mother because she almost always answers the phone when I call, and I have never left any voicemails pertaining to any of the topics listed in Mr. Cooprider's subpoena.

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: 7/25/2026

Signed by:

Liana Davis

330405A4516E41A...

LIANA DAVIS

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-00220

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

Defendants.

DECLARATION OF JONATHAN F. MITCHELL

1. My name is Jonathan F. Mitchell. I am over the age of 18 and fully competent in all respects to make this declaration.

2. I have personal knowledge of the facts stated in this declaration, and all of these facts are true and correct.

3. I represent plaintiff Liana Davis in this litigation, as well as nonparty Mary Anna Ziarko, and I submit this declaration in support of Ms. Ziarko's motion to quash subpoena.

4. The document attached as Exhibit 4 to this motion is an authentic copy of the subpoena that Mr. Coopridier's attorneys served on Ms. Ziarko.

5. The document attached as Exhibit 5 to this motion is an authentic copy of an e-mail that I sent to Mr. Coopridier's attorneys on June 15, 2026.

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: July 25, 2026

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

Liana Davis

*Plaintiff*Christopher Coopridge; Aid Access
GmbH; Rebecca Gomperts,*Defendant*

Civil Action No. 2:25-cv-220

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

MARY ANNA ZIARKO

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: 800 North Shoreline Blvd., Suite 2000, NT, Corpus
Christi, TexasDate and Time:
07/29/2026 1:00 pm

The deposition will be recorded by this method: Video and Stenographic

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

All text messages, email messages, and voice mails between you & Liana Davis from January 1, 2025 to the present that concern Liana Davis's pregnancies in 2025 and 2026, Christopher Coopridge, the events of April 5 - 6, 2025, Marshall Bowling, Jeffrey Sparks, abortion medication, & this lawsuit.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/03/2026

CLERK OF COURT

OR

Beth A. Klein

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Christopher Coopridge, who issues or requests this subpoena, are:

Beth Klein, S.D. Tex. Bar No. 3934133 Beth Klein, P.C., 350 Market Street, Suite 310, Basalt, CO 81621
beth@bethklein.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:25-cv-220

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____ .

☐ I served the subpoena by delivering a copy to the named individual as follows: _____

 _____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____
 _____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



From: Jonathan Mitchell jonathan@mitchell.law
Subject: depositions of Ami Amoroso and Mary Anna Ziarko
Date: June 14, 2026 at 2:29 AM
To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattsllp.com, Moscovitz, Barry bmoscovitz@thompsoncoe.com, Hamby, Oliver ohamby@thompsoncoe.com, Jimenez, Victoria vjimenez@thompsoncoe.com, Dupen, Craig cdupen@thompsoncoe.com
Cc: Talcott Franklin tal@tfpc.me, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com

Counsel:

If you issue subpoenas to depose either Ms. Amoroso or Ms. Ziarko, then we will move to quash the subpoenas and seek protective orders. Neither of these individuals has information or knowledge relevant to the case, and your efforts to depose family members of Ms. Davis who have no knowledge of Coopriders' actions is an act of harassment.

Ms. Davis testified that her mother knows nothing about her pregnancy with Coopriders or the alleged murder, and Ms. Davis concealed the pregnancy and the death of her unborn child from her elderly mother because "[s]he's 78 years old with a history of stroke. She has high blood pressure. I am her only child, really her only immediate family. I have deep concerns for her health and how that would affect her at her age." Davis Dep. 63:21-24.

Your insistence on deposing a frail, 78-year-old woman who has no knowledge of this lawsuit or what happened to her daughter is nothing short of cruelty. The deposition will reveal devastating information about her murdered granddaughter that Ms. Davis has kept from her mother for the sake of her health and well-being. Please reconsider your decision to seek this deposition.

If you decide to issue the subpoenas despite our request, please be sure to schedule the deposition in a manner that leaves time for us to seek relief from the Court.

—Jonathan

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

Liana Davis,

Plaintiff,

v.

Case No. 2:25-cv-220

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

Defendants.

**ORDER GRANTING NONPARTY MARY ANNA ZIARKO'S MOTION TO
QUASH SUBPOENA**

The motion to quash the subpoena served on nonparty Mary Anna Ziarko is
GRANTED.

Dated: _____

DAVID S. MORALES
UNITED STATES DISTRICT JUDGE