

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.

JOINT STATUS REPORT

The parties jointly file this Status Report in compliance with the Court's August 24, 2026 Order (D.E. 118). Plaintiff Liana Davis and Defendant Christopher Coopriders each provide their separate responses to the various topics on which the Court has requested an update:

(1) What devices, if any, Plaintiff has failed to provide to Array;

Plaintiff's report: Ms. Davis has provided all devices to Array that are covered by the Court's order of May 14, 2026 (ECF No. 67), and she has truthfully certified her compliance with the Court's order. After Ms. Klein e-mailed Ms. Clancy on August 17, 2026, and accused Ms. Davis of violating the Court's order by refusing to produce the required devices, Mr. Mitchell e-mailed Ms. Klein on *four* different occasions and asked her to identify which devices she thinks Ms. Davis is withholding from Array. *See* Mitchell Decl. ¶ 4 (attached as Exhibit 1); Exhibits 3–6. Ms. Klein refused to acknowledge or answer these requests. *See* Mitchell Decl. ¶ 5. Nor did Ms. Klein confer with Mr. Mitchell about this issue before e-mailing Ms. Clancy on August 17, 2026, and accusing Ms. Davis of violating the Court's order. *See id.* ¶ 6. At 5:45 a.m. this morning, Ms. Klein finally e-mailed Mr. Mitchell and claimed that Ms. Davis must turn over her

“work computer.” *See* Mitchell Decl. ¶ 10. But Ms. Davis’s work computer is not covered by the court’s order, and Ms. Klein never asked Ms. Davis to produce it until her email sent at 5:45 a.m. this morning. The Court’s order is limited to “her” “personal” devices. *See* ECF No. 67. Ms. Davis’s work computer is owned by her employer. It is not “hers” and it is not her “personal” device.

Defendant's report: The May 14, 2026 Order requires Plaintiff to produce and/or provide access to her phone, computer(s), iCloud account, and any other personal device or account that may contain text messages or emails (e.g., an iPad, any external hard drives containing backups). The Court’s July 10, 2026 order requires that Plaintiff shall provide a written certification on or before July 17, 2026, certifying that she has provided all devices as defined in the Court’s May 14, 2026 Order, (D.E. 67), to Array LLC. The Plaintiff’s written certification states: “I have turned over to Array LLC all devices described in the Court’s order of May 14, 2026, i.e., and all personal devices or accounts that may contain text messages or emails.” The Plaintiff’s certification excludes, for example, her work computer. Additionally and as addressed below, to date Ms. Davis’s iCloud account/data has not been successfully accessed.

(2) The status of the parties’ negotiation of an ESI order;

Plaintiff’s report: On August 24, 2026, Mr. Mitchell e-mailed counsel for Mr. Coopriider and asked them to send a draft ESI order for him to review. *See* Mitchell Decl. ¶ 7; Exhibit 6. Ms. Klein refused and insisted that Mr. Mitchell must draft the ESI order himself. *See* Mitchell Decl. ¶ 8; Exhibit 7. Mr. Mitchell wrote back and told them that he will not have time to draft an ESI order until after September 8, 2026, as he was retained yesterday to write a U.S. Supreme Court brief on the merits from scratch, which is due is less than two weeks on September 8, 2026. *See* Mitchell Decl. ¶ 9; Exhibit 8. Mr. Mitchell did, however, download a sample ESI order from Judge Charles Eskridge’s website and circulated that to opposing counsel, suggesting that the parties use that as a starting point for their discussions. *See* Mitchell Decl. ¶ 9; Exhibit 9.

Defendant's report: Defendant Coopriders's ESI Discovery Request, dated May 12, 2026, included proposed search terms, parameters, and ESI protocols in connection with the requested data. *See* Exhibit 11. Coopriders's counsel emailed a first draft proposed ESI order to Plaintiff's counsel on June 9, 2026. *See* Exhibit 12. Coopriders's counsel has repeatedly over the past 2-3 months asked Plaintiff's counsel to arrange for a meet-and-confer or to confer in writing regarding Plaintiff's objections to the ESI Discovery Requests and reach agreements on a proposed ESI order, but Plaintiff's position appears to be that she stands on all of her original objections to the ESI requests and seeks Court rulings on all of them. *See, e.g.,* Ex. 13 and 14. A useful ESI order cannot be drafted without further guidance on the appropriate search terms and scope of electronic discovery from the Court with respect to these pending objections.

(3) The status of any objections to the Vasiliou production, *see* (D.E. 101, p.1);

Plaintiff's report: Ms. Davis served objections to Coopriders's ESI discovery requests on June 12, 2026, well before the deadline of August 1, 2026. Those are the only discovery requests that Coopriders has ever served for the material on the Vasiliou extraction. Coopriders has never served a discovery request for the entire Vasiliou extraction. And if his lawyers were to serve such a request, Ms. Davis would object because any such discovery demand would be grossly overbroad and disproportionate to the needs of the case. Ms. Klein insists that she is entitled to entire Vasiliou extraction even though she has never served a discovery request for this. Her stance is untenable.

Defendant's report: The Vasiliou extraction was provided to Plaintiff's counsel on July 16, 2026. By the Court's July 10, 2026 Order, Plaintiff had 21 days to review the extraction and provide any objections to the extraction itself. Plaintiff has not make any objections to the extraction itself to date--though she maintains that her earlier objections to Coopriders's discovery requests seeking data from the extraction remain in effect pending rulings from the Court.

(4) Array's failure to comply with the Court's August 20, 2026 Order, including whether the August 21, 2026 meeting between Array and the parties took place;

Plaintiff's report: The parties met with Array on August 21, 2026. Ms. Klein e-mailed Array on August 25, 2026, to remind Array of its duty to submit a report of the meeting to the Court.

Defendant's report: Jake Nee sent an email to the parties, with a carbon copy to Ms. Clancy, the Court's coordinator following the meeting on August 21, 2026. *See Exhibit 15.*

(5) A status update on the iCloud download, which the parties appear to be working towards;

Plaintiff's report: Ms. Davis has already provided Array with the login credentials for her iCloud, and she will fully cooperate with Array's efforts to access the iCloud materials.

Defendant's report: The parties have outlined and agreed to begin a process to download the iCloud data from Davis's phone, based on the meeting with Array on August 21, 2026 and ongoing email messages between the parties and Array, with copies to Ms. Clancy the Court's Coordinator.

(6) Any other outstanding discovery issues.

Plaintiff's report: Mr. Coopriders' attorneys need to turn over the heavily redacted communications between Mr. Coopriders and Ilse Fragoso for in-camera inspection to ensure that responsive communications have not been redacted.

Defendant's report: The rulings on motions to quash Defendant's noticed depositions of Mary Anna Ziarko and Ami Amoroso are outstanding. Further refinement concerning including the Court on the communications with Array may be helpful. It is clear that all communications about payment, scheduling and all other matters are

being sent to Ms. Clancy, and this is unnecessary. A discovery conference and subsequent rulings on Plaintiff's objections to Defendant's ESI requests are a lynchpin in further discovery on the electronic data taking place.

Respectfully submitted.

/s/ Jonathan F. Mitchell

Jonathan F. Mitchell
Attorney-in-Charge
Texas Bar No. 24075463
S.D. Tex. Bar No. 1133287
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111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

Dated: August 26, 2026

Counsel for Plaintiff

AND COUNSEL FOR DEFENDANT COOPRIDER:

/s/ Craig Dupen

Beth Klein
Colorado Bar No. 17477
S.D. Tex. Bar No. 3934133
Beth Klein, P.C.
350 Market Street, Suite 310
Basalt, Colorado 81621
Email beth@bethklein.com
Phone 303-448-8884

– AND –

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– AND –

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Fax: (713) 403-8299

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that on August 26, 2026, I served this document through CM/ECF upon all counsel of record.

/s/ Craig Dupen

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, and I submit this declaration alongside the parties' joint status report of August 26, 2026.

4. After Ms. Klein e-mailed Ms. Clancy on August 17, 2026, and accused Ms. Davis of violating the Court's order by refusing to produce the required devices, I e-mailed Ms. Klein on four different occasions and asked her to identify which devices she thinks Ms. Davis is withholding from Array. Those e-mails are attached as Exhibits 3–6 to the joint status report.

5. Ms. Klein refused to acknowledge or answer any of these requests.

6. Ms. Klein also did not confer with me before accusing my client of failing to turn over the required devices in her e-mail to Ms. Clancy on August 17, 2026.

7. On August 24, 2026, I e-mailed counsel for Mr. Coopridner and asked them to send a draft ESI order for him to review. That e-mail is attached as Exhibit 6 to this joint status report.

8. Ms. Klein refused and insisted that I must draft the ESI order himself. Her e-mail is attached as Exhibit 7 to this joint status report.

9. I wrote back and explained that I will not have time to draft an ESI order until after September 8, 2026, as I was retained yesterday to write a U.S. Supreme Court brief on the merits from scratch, which is due is less than two weeks on September 8, 2026. That e-mail is attached as Exhibit 8 to this joint status report. I did, however, download a sample ESI order from Judge Charles Eskridge's website and circulated that to opposing counsel, suggesting that the parties use that as a starting point for their discussions. The e-mail circulating this draft ESI order is attached as Exhibit 9, and the draft order itself is attached as Exhibit 10.

10. At 5:45 A.M. this morning, Ms. Klein finally e-mailed me and claimed that Ms. Davis must turn over her "work computer." Ms. Klein never asked Ms. Davis to produce her work computer until this email that she sent at 5:45 A.M. this morning. She left me the dark and waited until only hours before the joint report is due before finally identifying the device that Ms. Davis supposedly "failed" to turn over. But the Court's order is clear that Ms. Davis needs only to turn over "her" "personal" devices. *See* Order of May 14, 2026 (ECF No. 67). Ms. Davis's work computer is owned by her employer. It is not "hers" and it is not her "personal" device. Ms. Klein's interpretation of the Court's order is absurd and abusive.

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: August 26, 2026


JONATHAN F. MITCHELL

From: Beth Klein beth@bethklein.com 

Subject: Request for Discovery Hearing

Date: August 17, 2026 at 2:44 PM

To: Arlene Clancy arlene_rodriguezclancy@txs.uscourts.gov

Cc: Jonathan Mitchell jonathan@mitchell.law, Mikal Watts mikal@wattsllp.com, Moscovitz, Barry bmoscowitz@thompsoncoecoe.com, Hamby, Oliver ohamby@thompsoncoecoe.com, Dupen, Craig cdupen@thompsoncoecoe.com, Jimenez, Victoria vjimenez@thompsoncoecoe.com

BK

Dear Ms. Clancy,

We need a discovery hearing on the following matters:

1. Plaintiff's intentional wall of obstruction of discovery and intentional Failure and Refusal to
 1. abide by the July 10, 2026 Court Order to produce all devices as defined by the Mary 14, 2026 order with a non -complying certification (Order paragraph 11.)
 2. cooperate or communicate in any way or to download the 53 GB of text data on Davis's iCloud. (Order paragraph 6)
 3. Cooperate or communicate in any way to negotiate an ESI order (Order paragraph 8)
 4. Provide any objections whatsoever to the Vasiliou production received by Plaintiff on July 16, 2026 - constituting a complete waiver of all objections. (Order paragraph 3)
 5. Providing materially false and misleading declarations to the Court in connection with the Motions to Quash the depositions of Ziarko and Amoroso.
 6. Failure to pay 50% of the costs of Array and Vasiliou. (May 14 Order and July 10, 2026 Order, paragraph 2)

Thank you.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621

BETH  KLEIN

From: Jonathan Mitchell jonathan@mitchell.law 

Subject: Re: Request for Discovery Hearing

Date: August 17, 2026 at 3:13 PM

To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Moscowitz, Barry bmoscowitz@thompsoncoec.com, Hamby, Oliver ohamby@thompsoncoec.com, Dupen, Craig cdupen@thompsoncoec.com, Jimenez, Victoria vjimenez@thompsoncoec.com

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



Counsel:

How did we fail to “produce all devices as defined by the Mary 14, 2026 order”? We turned over the second phone to Array LLC. And we provided the required certifications (attached) and e-mailed them to Ms. Clancy.

You never once complained to us about our production or certification before you e-mailed Ms. Clancy and falsely accused of violating the Court’s order.

Tell us NOW how the production and certifications were supposedly noncompliant.

—Jonathan



**Liana Davis
Declaration ...**
Downloading...



JFM Declaration.pdf
Downloading...

On Aug 17, 2026, at 2:44 PM, Beth Klein <beth@bethklein.com> wrote:

Dear Ms. Clancy,

We need a discovery hearing on the following matters:

1. Plaintiff’s intentional wall of obstruction of discovery and intentional Failure and Refusal to
 1. abide by the July 10, 2026 Court Order to produce all devices as defined by the Mary 14, 2026 order with a non -complying certification (Order paragraph 11.)
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Amoroso.

6. Failure to pay 50% of the costs of Array and Vasiliou. (May 14 Order and July 10, 2026 Order, paragraph 2)

Thank you.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

Documentary. Website

350 Market Street, Suite 310 Basalt CO 81621



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Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: Request for Discovery Hearing
Date: August 17, 2026 at 10:28 PM
To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Moscowitz, Barry bmoscowitz@thompsoncoe.com, Hamby, Oliver ohamby@thompsoncoe.com, Dupen, Craig cdupen@thompsoncoe.com, Jimenez, Victoria vjimenez@thompsoncoe.com
Cc: John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Talcott Franklin tal@tfpc.me

Still waiting for an answer on this.

On Aug 17, 2026, at 3:13 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Counsel:

How did we fail to “produce all devices as defined by the Mary 14, 2026 order”? We turned over the second phone to Array LLC. And we provided the required certifications (attached) and e-mailed them to Ms. Clancy.

You never once complained to us about our production or certification before you e-mailed Ms. Clancy and falsely accused of violating the Court’s order.

Tell us NOW how the production and certifications were supposedly noncompliant.

—Jonathan

[Click to Download](#)

Liana Davis Declaration (EXECUTED).pdf
92 KB

[Click to Download](#)

JFM Declaration.pdf
126.3 MB

On Aug 17, 2026, at 2:44 PM, Beth Klein <beth@bethklein.com> wrote:

Dear Ms. Clancy,

We need a discovery hearing on the following matters:

1. Plaintiff’s intentional wall of obstruction of discovery and intentional Failure and Refusal to
 1. abide by the July 10, 2026 Court Order to produce all devices as defined by the Mary 14, 2026 order with a non -complying certification (Order

- paragraph 11.)
2. cooperate or communicate in any way or to download the 53 GB of text data on Davis's iCloud. (Order paragraph 6)
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 4. Provide any objections whatsoever to the Vasiliou production received by Plaintiff on July 16, 2026 – constituting a complete waiver of all objections. (Order paragraph 3)
 5. Providing materially false and misleading declarations to the Court in connection with the Motions to Quash the depositions of Ziarko and Amoroso.
 6. Failure to pay 50% of the costs of Array and Vasiliou. (May 14 Order and July 10, 2026 Order, paragraph 2)

Thank you.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

Documentary Website

350 Market Street, Suite 310 Basalt CO 81621

<image001.png>

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(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: Conferrals and Unprofessional Conduct
Date: August 19, 2026 at 1:04 AM
To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Moscovitz, Barry bmoscowitz@thompsoncoe.com, Hamby, Oliver ohamby@thompsoncoe.com, Dupen, Craig cdupen@thompsoncoe.com, Jimenez, Victoria vjimenez@thompsoncoe.com
Cc: John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com, Talcott Franklin tal@tfpc.me

Beth:

The e-mails that you attached do not say a single word about items (a), (c), (d), or (e) in the e-mail that you sent to Ms. Clancy on August 17, 2026, at 4:44 p.m.

I have reviewed my e-mails and you never conferred with us about any of those four topics before you went running to the Court accusing us of discovery misconduct.

You must confer with your opposing counsel and provide him an opportunity to resolve the matter before asking the court to intervene a discovery dispute. That is basic professional courtesy and it is required by Rule 37(a)(1).

So I am requesting that you confer with us now. Tell us exactly:

- (1) How Ms. Davis failed to "abide by the July 10, 2026 Court Order to produce all devices as defined by the May 14, 2026 order";
- (2) How Ms. Davis's certifications failed to comply with the Court's order?
- (3) How we failed to "cooperate or communicate in any way to negotiate an ESI order."
- (4) What is "false and misleading" in the Ziarko and Amoroso declarations?

You have never raised any of these issues in any previous communication with us.

—Jonathan

On Aug 17, 2026, at 4:39 PM, Beth Klein <beth@bethklein.com> wrote:

Jonathan,

Here are three of the many conferral emails concerning ESI, objections, bill payment, etc.. starting in June.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary](#) [Website](#)

350 Market Street, Suite 310 Basalt CO 81621

BETH KLEIN



On Aug 17, 2026, at 2:54 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Ms. Clancy:

Ms. Klein has not conferred with me about the items on this list. I respectfully ask that the Court wait until Ms. Klein satisfies her meet-and-confer obligations before scheduling a hearing.

—Jonathan

On Aug 17, 2026, at 2:46 PM, Arlene Clancy
<Arlene_RodriguezClancy@txs.uscourts.gov> wrote:

Hello,

Received – I will advise Chambers of your request.

Respectfully,

<image002.png>

From: Beth Klein <beth@bethklein.com>
Sent: Monday, August 17, 2026 4:44 PM
To: Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>
Cc: Jonathan Mitchell <jonathan@mitchell.law>; Mikal Watts <mikal@wattslp.com>;
Moscowitz, Barry <bmoscowitz@thompsoncoe.com>; Hamby, Oliver
<ohamby@thompsoncoe.com>; Dupen, Craig <cdupen@thompsoncoe.com>; Jimenez,
Victoria <vjimenez@thompsoncoe.com>
Subject: Request for Discovery Hearing

CAUTION - EXTERNAL:

Dear Ms. Clancy,

We need a discovery hearing on the following matters:

1. Plaintiff's intentional wall of obstruction of discovery and intentional Failure and Refusal to
 1. abide by the July 10, 2026 Court Order to produce all devices as defined by the Mary 14, 2026 order with a non-complying certification (Order paragraph 11.)
 2. cooperate or communicate in any way or to download the 53 GB of text

- data on Davis's iCloud. (Order paragraph 6)
3. Cooperate or communicate in any way to negotiate an ESI order (Order paragraph 8)
 4. Provide any objections whatsoever to the Vasiliou production received by Plaintiff on July 16, 2026 – constituting a complete waiver of all objections. (Order paragraph 3)
 5. Providing materially false and misleading declarations to the Court in connection with the Motions to Quash the depositions of Ziarko and Amoroso.
 6. Failure to pay 50% of the costs of Array and Vasiliou. (May 14 Order and July 10, 2026 Order, paragraph 2)

Thank you.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

Documentary Website

350 Market Street, Suite 310 Basalt CO 81621

<image003.png>

Jonathan F. Mitchell
Mitchell Law PLLC
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jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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Email 2.pdf



Email 3.pdf



Email conferral 1.pdf





From: Jonathan Mitchell jonathan@mitchell.law
Subject: Fwd: Activity in Case 2:25-cv-00220 Davis v. Coopriider et al Order
Date: August 24, 2026 at 11:12 PM
To: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Barry Moscovitz bmoscowitz@thompsoncoecoe.com, Oliver Hamby ohamby@thompsoncoecoe.com, Victoria Jimenez vjimenez@thompsoncoecoe.com, Craig Dupen cdupen@thompsoncoecoe.com
Cc: Talcott Franklin tal@tfpc.me, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com

Counsel:

In preparation of the joint submission that is due in less than 48 hours:

- (1) Tell us IMMEDIATELY what devices you think Ms. Davis has failed to provide to Array. Ms. Klein's e-mail to Ms. Clancy accuses us of failing to provide devices and you have never identified what those devices are even though I asked you about this days ago. Tell us what those devices are or withdraw your accusation.
- (2) Please send a draft ESI order for us to review.
- (3) I have already explained our stance on the Vasiliou production.
- (4) I recommend that we e-mail Array and remind them that they need to produce the report that Judge Morales ordered. I think we could draft the report for them as long as both sides agree to the contents of the draft before sharing it with Array, but let me know if you disagree.
- (5) I don't think there is anything further for the Court to resolve regarding the iCloud download. If you disagree please let us know.
- (6) Please let us know if there are other discovery issues. I am considering mentioning Coopriider's waiver of the attorney-client privilege that we flagged in the discovery requests that we served yesterday. If you disagree that he waived privilege then we might want to ask the Court to resolve that dispute now.

—Jonathan

**118 - ORDERJoint
Submission Date ...**
66 KB



Begin forwarded message:

From: DCECF_LiveDB@txs.uscourts.gov
Subject: Activity in Case 2:25-cv-00220 Davis v. Coopriider et al Order
Date: August 24, 2026 at 12:38:09 PM PDT
To: DC_Notices@txsd.uscourts.gov

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT

RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

SOUTHERN DISTRICT OF TEXAS

Notice of Electronic Filing

The following transaction was entered on 8/24/2026 at 2:38 PM CDT and filed on 8/24/2026

Case Name: Davis v. Coopridner et al

Case Number: [2:25-cv-00220](#)

Filer:

Document Number: [118](#)

Docket Text:

ORDERJoint Submission Date 8/26/2026 by 12:00 p.m. (Signed by Judge David S Morales) Parties notified. (arc2)

2:25-cv-00220 Notice has been electronically mailed to:

Barry A Moscowitz bmoscowitz@thompsoncoe.com, dmckenzie@thompsoncoe.com, everweij@thompsoncoe.com, KOFlannigan@thompsoncoe.com, LSflowers@thompsoncoe.com, ohamby@thompsoncoe.com, pdurrwachter@thompsoncoe.com, Rgoss@thompsoncoe.com, vjimenez@thompsoncoe.com, wking@thompsoncoe.com

Beth Ann Klein beth@bethklein.com

Blake Anthony Green blakeg@corpuschristitx.gov, BeaV@corpuschristitx.gov, CarinaLV@corpuschristitx.gov, EricaDL@corpuschristitx.gov, liliac@corpuschristitx.gov

Cassie J. Dallas cdallas@thompsoncoe.com, jsullivan@thompsoncoe.com

Clifford Paul Riley Cliff.Riley@slfirm.com, DocketDA@dykema.com, KLowery@dykema.com

Craig Douglas Dupen cdupen@thompsoncoe.com, wking@thompsoncoe.com

John Clay Sullivan john.sullivan@the-sl-lawfirm.com, lshults@morganlewis.com

Jonathan Franklin Mitchell jonathan@mitchell.law

Mikal C Watts mikal@wattslip.com, cindy@wattslip.com, rickholstein@mac.com

Victoria Lynn Jimenez vjimenez@thompsoncoe.com, dmckenzie@thompsoncoe.com

William L. Mennucci bmennucci@vkv.law

2:25-cv-00220 Notice has not been electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1045387613 [Date=8/24/2026] [FileNumber=47399044-0] [9332ba32aed922a445dc5c0798c2e6d78bc1e9eced118b5d2a48a1c954f7bee11432ea64e422700cdfaf72360a782bb069dfc2d14e7d74fab369151dfce2a7d]]

Jonathan F. Mitchell
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(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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**PRIVILEGED AND CONFIDENTIAL — ATTORNEY-CLIENT COMMUNICATION /
ATTORNEY WORK PRODUCT**

From: Beth Klein beth@bethklein.com
Subject: RE: Activity in Case 2:25-cv-00220 Davis v. Coopriders et al Order
Date: August 25, 2026 at 8:33 AM
To: Jonathan Mitchell jonathan@mitchell.law, Mikal Watts mikal@wattsllp.com, Barry Moscovitz bmoscowitz@thompsoncoe.com, Oliver Hamby ohamby@thompsoncoe.com, Victoria Jimenez vjimenez@thompsoncoe.com, Craig Dupen 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

1. Please prepare the ESI draft and forward it for our review. You are the Plaintiff.
2. Please review your objections and tell us what objections you are willing to withdraw. I have been requesting conferral on your objections since June 14, 2026 (see attached), and I have made specific requests which you refused. Conferral has and does require your cooperation, which has been absent. We prefer that all conferrals be in writing.
3. We are preparing our portion of the draft of the Status Report.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621



From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Tuesday, August 25, 2026 12:13 AM
To: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattsllp.com>; Barry Moscovitz <bmoscowitz@thompsoncoe.com>; Oliver Hamby <ohamby@thompsoncoe.com>; Victoria Jimenez <vjimenez@thompsoncoe.com>; Craig Dupen <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>
Subject: Fwd: Activity in Case 2:25-cv-00220 Davis v. Coopriders et al Order

Counsel:

In preparation of the joint submission that is due in less than 48 hours:

- (1) Tell us IMMEDIATELY what devices you think Ms. Davis has failed to provide to

Array. Ms. Klein's e-mail to Ms. Clancy accuses us of failing to provide devices and you have never identified what those devices are even though I asked you about this days ago. Tell us what those devices are or withdraw your accusation.

(2) Please send a draft ESI order for us to review.

(3) I have already explained our stance on the Vasiliou production.

(4) I recommend that we e-mail Array and remind them that they need to produce the report that Judge Morales ordered. I think we could draft the report for them as long as both sides agree to the contents of the draft before sharing it with Array, but let me know if you disagree.

(5) I don't think there is anything further for the Court to resolve regarding the iCloud download. If you disagree please let us know.

(6) Please let us know if there are other discovery issues. I am considering mentioning Coopriders' waiver of the attorney-client privilege that we flagged in the discovery requests that we served yesterday. If you disagree that he waived privilege then we might want to ask the Court to resolve that dispute now.

—Jonathan

Begin forwarded message:

From: DCECF_LiveDB@txs.uscourts.gov

Subject: Activity in Case 2:25-cv-00220 Davis v. Coopriders et al Order

Date: August 24, 2026 at 12:38:09 PM PDT

To: DC_Notices@txsd.uscourts.gov

**This is an automatic e-mail message generated by the CM/ECF system.
Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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ohamby@thompsoncoe.com, pdurwachter@thompsoncoe.com,
Rgoss@thompsoncoe.com, vjimenez@thompsoncoe.com,
wking@thompsoncoe.com

Beth Ann Klein beth@bethklein.com

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lshults@morganlewis.com

Jonathan Franklin Mitchell jonathan@mitchell.law

Mikal C Watts mikal@wattsllp.com, cindy@wattsllp.com,
rickholstein@mac.com

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William L. Mennucci bmennucci@vkv.law

2:25-cv-00220 Notice has not been electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1045387613 [Date=8/24/2026]

[FileNumber=47399044-

0]

[9332ba32aed922a445dc5c0798c2e6d78bc1e9eced118b5d2a48a1c954f7
bee114

32ea64e422700cdfaf72360a782bb069dfc2d14e7d74fab369151dfce2a7d

]]

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Email 3.pdf



Email conferral 1.pdf



2.3 MB



1 MB





From: Jonathan Mitchell jonathan@mitchell.law
Subject: Re: Activity in Case 2:25-cv-00220 Davis v. Coopriders et al Order
Date: August 25, 2026 at 5:26 PM
To: Beth Klein beth@bethklein.com
Cc: Mikal Watts mikal@wattsllp.com, Barry Moscovitz bmoscovitz@thompsoncoe.com, Oliver Hamby ohamby@thompsoncoe.com, Victoria Jimenez vjimenez@thompsoncoe.com, Craig Dupen cdupen@thompsoncoe.com, Talcott Franklin tal@tfpc.me, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com

(1) I will not have time to draft an ESI order until after September 8, 2026. I was just retained to re-write a SCOTUS merits brief from scratch, which is due two weeks from today on September 8, so I will have to devote my time and attention to that between now and then.

I'm happy to draft and circulate something after September 8, but it will have to wait until then unless you want to circulate a draft ESI order sooner.

(2) I propose that we start by agreeing to stipulate that Array will extract Ms. Davis's recordings on the night of April 5, 2026, and in exchange for that you will stipulate that Array will extract Coopriders's location history in the early morning of April 6, 2026, as well as his internet-search history and AI chatbox activity history that we requested in the RFPs that we served yesterday.

You are welcome to offer additional proposals.

You have not "requested" any "conferral" on my objections. All you have done is demand that I withdraw the entirety of my objections. That is not a request to confer. In response, I offered to confer, and you did not respond or take me up on the offer. Stop lying about our past communications.

I agree that all conferrals should be in writing because you have shown that you cannot be trusted to truthfully relate what I have said to you.

(3) I have not seen your portion of the draft status report. I apologize if I have missed it, but please send it to me so I can add my portion and file it.

On Aug 25, 2026, at 8:33 AM, Beth Klein <beth@bethklein.com> wrote:

1. Please prepare the ESI draft and forward it for our review. You are the Plaintiff.
2. Please review your objections and tell us what objections you are willing to withdraw. I have been requesting conferral on your objections since June 14, 2026 (see attached), and I have made specific requests which you refused. Conferral has and does require your cooperation, which has been absent. We prefer that all conferrals be in writing.
3. We are preparing our portion of the draft of the Status Report.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

Documentary Website

350 Market Street, Suite 310 Basalt CO 81621

<image001.png>

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Tuesday, August 25, 2026 12:13 AM

To: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattsllp.com>; Barry Moscovitz <bmoscovitz@thompsoncoecoe.com>; Oliver Hamby <ohamby@thompsoncoecoe.com>; Victoria Jimenez <vjimenez@thompsoncoecoe.com>; Craig Dupen <cdupen@thompsoncoecoe.com>

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The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1045387613 [Date=8/24/2026]

[FileNumber=47399044-

0]

[9332ba32aed922a445dc5c0798c2e6d78bc1e9eced118b5d2a48a1c9

54f7bee114

32ea64e422700cdfaf72360a782bb069dfc2d14e7d74fab369151dfce2

a7d]]

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(512) 686-3941 (fax)

jonathan@mitchell.law

papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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**PRIVILEGED AND CONFIDENTIAL — ATTORNEY-CLIENT COMMUNICATION /
ATTORNEY WORK PRODUCT**



From: Jonathan Mitchell jonathan@mitchell.law

Subject: draft ESI order

Date: August 26, 2026 at 8:45 AM

To: Dupen, Craig CDupen@thompsoncoe.com

Cc: Beth Klein beth@bethklein.com, Mikal Watts mikal@wattslp.com, Moscovitz, Barry BMoscowitz@thompsoncoe.com, Hamby, Oliver OHamby@thompsoncoe.com, Jimenez, Victoria VJimenez@thompsoncoe.com, Franklin Talcott tal@tfpc.me, John C. Sullivan john.sullivan@the-sl-lawfirm.com, Cliff P. Riley cliff.riley@slfirm.com

Counsel:

I have attached a draft ESI order that appears on Judge Charles Eskridge's website. We can use this as a starting point for our discussions.

—Jonathan

**Standard-E-
Discovery-Order.docx**

18 KB



Jonathan F. Mitchell
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

_____	§	
Plaintiff,	§	
	§	CIVIL ACTION NUMBER
versus	§	
	§	
_____	§	
Defendant.	§	JUDGE CHARLES ESKRIDGE
	§	

STANDARD E-DISCOVERY ORDER

This Order supplements all other discovery rules and orders. The Court’s intent is to streamline discovery of electronically stored information to promote a “just, speedy, and inexpensive determination” of this action. FRCP 1. The parties must work cooperatively and in good faith to achieve these goals.

1. General ESI production.

Absent agreement of the parties or further order, the following parameters apply to ESI production other than email under Rules 34 and 45 or in compliance with a disclosure requirement of this Court:

- a. **Document image format.** A producing party must produce each electronic document in single-page Tagged Image File Format. TIFF files must be single page and named with a unique production number followed by the appropriate file extension. Load files must be provided to indicate the location and unitization of the TIFF files. If a document is more than one page, the unitization of the document and any attachments and/or affixed notes must be maintained as they existed in the original document.
- b. **Metadata.** Absent a showing of good cause, ESI need not include production of metadata.
- c. **Fields included.** Where such fields exist, ESI must include the date and time that a document was sent and received, as well as the complete distribution list.
- d. **Text-searchable documents.** No party has an obligation to make its production searchable by text. But where a party’s documents already exist in such format independent of this litigation, or are converted to such format for use in this litigation (including for use by the producing party’s counsel), then such documents must be produced in the same format at no cost to the receiving party.

- e. **Footer.** Each document image must contain a footer with a sequentially ascending production number.
- f. **Native files.** A party receiving a document produced in the format specified above may make a reasonable request after review to receive the document in its native format. Upon such request, the producing party must produce the document in its native format or bring concerns of burden to the requesting party's attention.
- g. **No backup restoration required.** Absent a showing of good cause, when complying with discovery obligations in the present case, no party need restore any form of media upon which backup data is maintained in a party's normal operations. This includes without limitation backup tapes, disks, SAN, and other forms of media.
- h. **Voicemail and mobile devices.** Absent a showing of good cause, voicemails, PDAs, and mobile phones are deemed to be not reasonably accessible and need not be collected and preserved.

2. E-mail production.

Absent agreement of the parties or further order, the following parameters apply to email production under Rules 34 and 45, or compliance with a mandatory disclosure requirement of this Court:

- a. **Requests for email.** E-mail refers to electronic mail or any form of electronic correspondence. Parties must propound specific production requests to obtain e-mail.
- b. **Production timing.** E-mail production requests must be phased to occur with reasonable dispatch after the parties have exchanged:
 - Initial disclosures;
 - A specific listing of likely e-mail custodians;
 - A specific identification of the five most significant listed e-mail custodians in view of the pleaded claims and defenses; and
 - Preliminary information relevant to damages.

The exchange of this information must commence within twenty-one days of such initial disclosures unless the parties mutually agree to another time.

- c. **Identification of custodians.** E-mail production requests must identify the custodian, search terms, and time frame. The parties must cooperate in good faith to identify the proper custodians, search terms, and time frame. Each requesting party must limit its e-mail production requests to a total of five custodians per producing party. The Court may require production from additional e-mail custodians upon a showing of good cause after the requesting party reviews the initial production.
- d. **Search terms.** Each requesting party must limit its e-mail production requests to a total of ten search terms per custodian per party, unless the parties mutually agree to additional

terms. The search terms must be narrowly tailored to particular issues. Indiscriminately broad terms (such as the producing company's name or its product name) are inappropriate unless combined with narrowing search criteria that sufficiently reduce overproduction and burden. A conjunctive combination of multiple words or phrases (for instance, computer and system) narrows the search and counts as a single search term. A disjunctive combination of multiple words or phrases (for instance, computer or system) broadens the search and counts each word or phrase as a separate search term, unless they are variants of the same word. Where appropriate, the parties must use narrowing search criteria (for instance, and, or but not, or w/x) to limit production and burden.

3. Best efforts and cost-shifting.

The parties must use best efforts to work cooperatively and in good faith to narrow queries as necessary to reasonably reduce the burden on the searching/producing party. The Court will consider the extent of cooperation and good faith when determining whether to shift costs for disproportionate discovery, where applicable. The Court will specifically consider a party's efforts to promote efficiency and reduce costs in this regard.

4. Disputes.

The parties must confer in good faith before bringing any dispute to the attention of the Court. Proceed according to Section 15 of this Court's procedures published on its website.

5. No waiver.

The mere production of ESI in this litigation as part of a mass production does not itself constitute a waiver for any purpose.

6. Inadvertent production.

The inadvertent production of ESI that includes privileged material, including attorney/client or attorney work product material, is not a waiver in the pending case or in any other federal or state proceeding. FRE 502(d).

7. Other rules remain applicable.

Nothing in this Order affects the parties' discovery obligations under the Federal Rules, the Local Rules, or this Court's Procedures. But on any inconsistency applicable to ESI, the Court will apply this Order first.

Signed on _____, at Houston, Texas.

Honorable Charles Eskridge
United States District Judge

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

Liana Davis,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Case No. 2:25-cv-220
	*	
Christopher Cooprider,	*	
Aid Access GmbH, &	*	
Rebecca Gomperts,	*	
	*	
Defendants.	*	

**DEFENDANT CHRISTOPHER COOPRIDER'S FOURTH SET OF
PRODUCTION OF DOCUMENTS TO PLAINTIFF LIANA DAVIS**

PROPOUNDING PARTY: DEFENDANT CHRISTOPHER COOPRIDER

RESPONDING PARTY: PLAINTIFF LIANA DAVIS

YOU ARE HEREBY REQUESTED, pursuant to Rule 34 of the Federal Rules of Civil Procedure, to produce your current I-phone, all phones you have used between 1/1/2026 and the present and all computers you have used between 1/1/2026 and the present and iCloud remote storage("DEVICES") for inspection of the following the designated electronically stored information The following data sources on cell phones and laptops shall be collected and collection must be forensically sound (write-blocked imaging, hash verification). A Motion will be filed to request immediate inspection of the DEVICES.

Source / Application	Data Types to Collect	Notes
Native SMS/iMessage (iOS)	Message content, timestamps, read receipts, deleted messages (via forensic tool)	Requires Cellebrite/GrayKey or equivalent; iCloud backup may preserve deleted msgs

Source / Application	Data Types to Collect	Notes
Android SMS/RCS	Message content, timestamps, delivery status, deleted messages	Varies by carrier; forensic extraction recommended
WhatsApp	Messages, attachments, call logs, group chats, deleted messages	Both device and cloud backup (Google Drive/iCloud) to be collected
Snapchat	Snaps, messages, My Eyes Only (if accessible)	Ephemeral; forensic extraction only; subpoena Snap Inc. for server-side data
Instagram DMs	Direct messages, shared media	Subpoena Meta; also check device cache
Facebook Messenger	Messages, calls, media	Subpoena Meta; device and cloud
Signal	Messages (if unencrypted backup exists), call logs	End-to-end encrypted; server-side subpoena unlikely to yield content
Email (all accounts)	Sent/received/deleted, attachments	Gmail, Outlook, Apple Mail; include all accounts on device
Browser History / Search	Search queries, visited URLs, autofill data	Incognito/private mode may limit; forensic tool may recover
Notes / Reminders Apps	Apple Notes, Google Keep, Samsung Notes, etc.	Check for drafts, deleted notes
Calendar / Scheduling Apps	Appointments, event details, reminders	Cross-reference with pharmacy visits, doctor appointments
Health / Fitness Apps	Apple Health, Fitbit, cycle tracking apps	May document physical symptoms, menstrual tracking
Photos / Videos	Images, videos, screenshots, metadata (GPS, timestamp)	EXIF data critical; cloud photo libraries

Source / Application	Data Types to Collect	Notes
Voicemails / Call Logs	All incoming/outgoing/missed calls	Include carrier CDRs via subpoena
Cloud Storage	iCloud Drive, Google Drive, Dropbox, OneDrive	May contain backup of deleted messages and files
Laptop – All of above	Browser history, email clients, iMessage (Mac), downloaded files, trash	Mirror forensic image required; hash verification

COLLECTION AND FORENSIC METHODOLOGY

A. Forensic Imaging Requirements

1. All cell phones and laptops shall be imaged using forensically sound methods that prevent alteration of the original evidence.
2. Acceptable tools include: Cellebrite UFED, Magnet AXIOM, GrayKey (for locked iOS), Oxygen Forensic Detective, FTK, EnCase, or court-approved equivalent.
3. A full physical extraction (not logical only) shall be performed where technically feasible to recover deleted data.
4. MD5 and SHA-256 hash values shall be documented for all forensic images and produced with collections.
5. Chain of custody documentation shall accompany all devices from seizure through production.

B. Mobile Device – Specific Collection Steps

1. Document device make, model, OS version, serial number, IMEI, and phone number before imaging.
2. Disable cloud sync and enable airplane mode prior to imaging to prevent remote wipe.
3. Collect from: internal storage, SIM card, SD card (if present), and linked cloud accounts.
4. Attempt recovery of deleted messages, deleted call logs, and deleted application data.
5. Collect app-specific containers for all messaging, email, browser, and health applications identified in Section IV.

C. Laptop / Computer – Specific Collection Steps

1. Full forensic image of hard drive (and SSD) using write blocker.
2. Collect browser history, downloads folder, trash/recycle bin (including deleted items), email client data files (.pst, .ost, .mbox), and cloud sync folders.
3. Recover deleted files using forensic tool file carving capabilities.
4. Document all user accounts on the device.
5. For Mac: collect iMessage database (~/.Library/Messages/chat.db), Notes, and iCloud-synced data.

PRODUCTION SPECIFICATIONS

Item	Specification
Production format – text messages	Native format (e.g., .db, .plist) AND human-readable PDF/HTML export with metadata intact
Production format – emails	Native .eml or .msg with full headers; PDF with metadata for review
Production format – documents	Native format (Word, PDF, Excel); no conversion that strips metadata
Metadata fields required	Custodian, file name, file path, date created, date modified, date last accessed, file size, MD5/SHA-1 hash, author, application
De-duplication	Global de-duplication permitted; produce de-duplication log identifying all family members
Load file	Concordance/DAT load file with image cross-reference (.opt) for document review platform
Bates numbering	Sequential; prefix DAVIS INSPECTION #

EXCLUSIONS

1. All COMMUNICATIONS between Liana Davis and Jonathan Mitchell, her attorney in this matter are excluded from production, as long as they have not been provided to third parties and the privilege waived. 703-314-9276 and email jonathan@mitchell.law domain www.mitchell.law

2. All COMMUNICATIONS between Liana Davis and S. Dylan Pearcy, her family law attorney are excluded from production, as long as they have not been provided to third parties and the privilege waived. Domain www.dylanpearcylaw.com

3. All COMMUNICATIONS between Liana Davis and Talcott Franklin tal@tfpc.me domain www.tfpc.me are excluded from production as long as they have not been provided to third parties and the privilege waived.

DEFINITIONS

The definitions below are incorporated into EACH request for production (the “Requests”).

1. “YOU” AND “YOUR” means Plaintiff LIANA DAVIS Cell phone number 412-295-7136 & Email Liana_webster@att.net and two hidden emails on iCloud.
2. “COMMUNICATION(S)” the terms “communication” and “communicate” refer to any method used to transmit or exchange information, concepts, or ideas (whether verbal or nonverbal) including oral, written, typed, or electronic transmittal of any type of information or data, by the use of words, silence, numbers, symbols, images, or depictions, from one person or entity to another person or entity.
3. “DOCUMENT(S)” the terms “document” and “documents” refer to any electronically stored information—including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained **not** transmitted from one person or entity to another person or entity.

Request 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.

Category	Search Terms / Keywords
Abortion-inducing medication	misoprostol OR mifepristone OR miso OR "abortion pill" OR "Plan B" OR "morning after" OR RU-486 OR methotrexate OR cytotec OR "terminate pregnancy" OR "end pregnancy" OR "medication abortion" OR pills OR pill OR "internet pills"
Ingestion	Poisoned OR "put in my drink" OR bitter OR diarrhea OR spoons OR "anything in my drink" OR swallow OR swallowing Or Weird OR drink OR "internet pills" OR "empty pill bottle" OR "poison control" OR crushed OR put alcohol" OR rinsed OR spiked OR "funny taste" OR "bitter taste" Or stirring OR "closing a container" OR stir OR stirred OR "next to my purse" OR "dog out" OR "go to the ER" OR "unknown amount of" OR "intentionally delaying" OR "spoon stirring" OR "mixed into my drink"
Pregnancy / Complications	pregnant OR pregnancy OR "test" OR "positive" OR "negative" OR "missed period" OR "OB" OR "OBGYN" OR "prenatal" OR ultrasound OR miscarriage OR "bleeding" OR "February 2, 2025" OR "ovulation strips" OR ultrasound OR hCG OR weeks OR puke OR puking OR bump OR geriatric OR weeks OR baby OR OB/GYN OR Gyno OR obstetrician OR "obstetrician's office" OR "home test"
Cover-up	"don't tell" OR "keep quiet" OR "can't know" OR "nobody knows" OR "haven't told" OR "just between us" OR secret OR hide OR cover OR "get rid" OR "take care of it" OR blackmail Or delete OR deleting OR destroy OR lied OR lied OR lying OR record OR recorded OR recordings OR wipe OR discovery OR "do not use his name in texts" OR "March 24, 2025"
Physical / emotional reactions	sick OR cramping OR cramp OR bleeding OR pain OR "didn't feel well" OR "felt off" OR scared OR hospital OR ER OR "urgent care" OR "called the doctor" OR clumpy OR chlamydia OR gush OR gushing OR terminate OR fever OR temperature OR temp OR discharge OR "bail on me" OR disrespectful
Health Conditions	Progesterone OR temperature OR temp OR burning OR "burning up" OR geriatric OR STI OR chlamydia OR antibiotic OR insert OR "red bull" OR pre-workout OR migraine OR "not eating" OR "being sick could have hurt it?" OR pain OR inflammation OR "chronic pain" OR "pain level" OR alcohol OR "grown-up drink" OR booze OR buzzed OR drunk OR "if it's alive" OR "online patient portal"

Category	Search Terms / Keywords
Wrongful Prosecution	USMJ OR police OR Mancuso OR DA OR "District Attorney" OR prosecute OR "Marines Family Advocacy Program" or FAP or "Police Chief" or "Pregnancy Center of Coastal Bend" or NCIS OR scrubbing OR "legal hold" OR criminal charges" OR sanctions OR murderer OR murder OR "violent crime" OR nail OR rip OR military benefits" OR CCPD OR "post on Facebook" OR "felony charges" OR UCMJ OR Crime OR 2504060017 OR "Crime Victim's Compensation Fund" OR CVC OR "Bertha Aguas" OR "slap him" OR "shut him up" OR "take his medicine" OR "destroy"
Pregnancy Termination	Miscarriage OR gush OR gushing OR "gushing blood" OR cramp OR cramping OR emergency OR killed OR Poison OR pain OR murder OR "soaking OR "soaking pads" OR clots OR "passing clots"" OR death OR blood OR bleeding OR abandon OR abandoned OR abandoning OR drugged OR "poor baby" OR "hot chocolate" OR "barely eating" OR "high impact" OR expel OR expelling OR faked OR "lost a whole pint" OR "bleeding out" OR alcohol OR "pile of blood" OR "sitting here in a pile" OR "heart rate" OR "history of hemorrhaging" OR "likely-deceased embryo" OR "code red" OR OR "fucking code red" dizzy OR tampons OR PTSD OR "cause of death" OR "unhealthy pregnancy" OR "not taking prescribed medication" OR "no way to say" OR spotting OR "stomach cramps"
People	"Jana Pinson" OR Coop OR Chris OR Christopher OR Coopridier OR obstetrician OR melissa OR madrigal OR "Ami Amoroso" OR Voldemort OR "he who must not be named" OR trophy OR "The Shittiest Human" OR "failure of a man" OR "orange pubes" OR "ginger pubes" OR "baby killer" OR asshole OR "stupid fucking asshole"
Comments concerning this lawsuit with third parties	Lawsuit OR Answer OR "suing me" OR "I may lose" OR discovery OR "want my phone" OR "want my computer" OR "won't produce my computer without a court order" OR bogus OR "how will I pay"

Request No. 2 Produce all DEVICES for extraction of all COMMUNICATIONS in native format between YOU and YVONNE YAKOPOVICH Cell phone number 724-858-7419 from 4/1/2025 to the present.

Request 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.

Request 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.

Request 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.

Request 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.

Request No. 7 Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and MARK LEE DICKSON from 1/1/2025 to the present.

Request 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.

Request No. 9 Produce all DEVICES for extraction of all COMMUNICATIONS between YOU and ROMY SATERY FROM 1/1/2025 to the present.

Request 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.

Request 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 Coopridier (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"

Request No. 12 Produce all DEVICES for retrieval and extraction of your location data for 4/1/2025 to 4/7/2025.

Request No. 13 Produce all DEVICES for retrieval and extraction of audio recordings of YOU having sex with Defendant.

Request 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.

Request No. 15 Produce all DEVICES for an analysis of data deletion, data loss, and data movement since 1/1/2025.

Request 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.

Request No. 17 Produce all DEVICES for an analysis of a work out tracking apps for the dates 1/1/2025 to 4/5/2025.

Request 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.

May 13, 2026

Respectfully submitted,

BETH KLEIN, P.C.

By: /s/ Beth Klein

Beth Klein

Colorado Bar No. 17477

S.D. Tex. I.D. No. 3934133

beth@bethklein.com

350 Market Street, Suite 310

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Telephone: (303) 448-8884

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ATTORNEY-IN-CHARGE FOR CHRISTOPHER COOPRIDER

Barry A. Moscowitz

THOMPSON, COE, COUSINS & IRONS, LLP

Texas State Bar No. 24004830

Federal Bar ID No. 31054

bmoscowitz@thompsoncoe.com

700 North Pearl Street, 25th Floor

Dallas, Texas 75201

Telephone: (214) 871-8200

Facsimile: (214) 871-8209

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2026, a copy of the foregoing discovery request was sent via email to all counsel of record.

/s/ Beth Klein
Beth Klein

Dupen, Craig

From: Moscowitz, Barry
Sent: Tuesday, June 9, 2026 11:34 AM
To: Jonathan Mitchell
Cc: Beth Klein; Mikal Watts; Talcott Franklin; Jimenez, Victoria; Hamby, Oliver; John C. Sullivan; Cliff P. Riley; Dupen, Craig
Subject: RE: draft stipulation and order [IMAN-TCLAW.FID2728850]
Attachments: Stipulated ESI Agreement.docx

See my responses below in red.



Barry Moscowitz • Partner
700 North Pearl Street, 25th Floor, Dallas, TX 75201
o: 214-871-8275 • m: 214-909-7236
[bio](#) • [vCard](#) • [web](#)

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Tuesday, June 9, 2026 11:20 AM
To: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>
Subject: Re: draft stipulation and order [IMAN-TCLAW.FID2728850]

Barry:

(1) I did not see a “proposed initial ESI protocol” as an attachment to your e-mail of 10:25 a.m. this morning. **Sorry about that. I have attached it to this e-mail. It is meant to be a starting point for discussions and I welcome your input.**

(2) The stipulation must provide that the forensics expert will be appointed by the Court and report directly to the Court. That is a deal-breaker for me. **I’m fine with the expert being appointed by the Court and reporting directly to the Court until such time as the Court orders otherwise. Feel free to make that change and I will review.**

(3) Your definition of “the conclusion of the case” in paragraph 2 is inadequate. If the case settles or if a party voluntarily dismisses the case, there will be no “final appealable Order from this Court or a final Order from either the Fifth Circuit Court of Appeals or the United States Supreme Court.” **Ok. Then propose your change to the relevant paragraph and I will review.**

(4) I reached out to Russell Chozick yesterday but have not heard back from him. I am willing to have Mr. Chozick serve as the custodian if he executes a sworn affidavit denying that he has any prior relationship with the parties in the case. He must also agree to accept a court appointment and report directly to the

Court. Fine by me. Let me see the affidavit you would like him to execute. See also my comments to (2) above.

(5) Your revisions to paragraph 4 are unacceptable. You told George Vasiliou that you had a “signed ESI order of the Court” when you accessed the contents of my client’s cell phone and insisted at Ms. Davis’s deposition and before the Court at the hearing of June 2, 2026. You regard Judge Morales’s order of May 14, 2026, as a “signed ESI order.” We need explicit language that will stop you from repeating what you did with George Vasiliou. I don’t really know what you are talking about so if you have some proposed language to include, please do so.

(6) There must be a provision for sanctions if an attorney accesses data or communicates with the court-appointed forensics expert in violation of the stipulation. I don’t think there should be some automatic sanction, but if you have some language you want to propose, feel free to do so. We are not going to be communicating directly with Mr. Chozick other than what is provided for in the proposed stipulation, and I suspect you are similarly not going to contact him. What if Mr. Chozick were to reach out to you (or vice versa) about a two-factor authentication, for example? I would not want you sanctioned for that.

(7) I will not have Ms. Davis agree to turn over “all devices containing potentially relevant electronic data, images, information, metadata, etc. within three (3) days of this Order.” Well then what is your proposal? I am not moving the goalposts, but merely tracking (1) what Plaintiff said at her deposition, and (2) what Judge Morales stated during our last hearing where explicitly told you he did not want to learn that there is a third or fourth cell phone/device. He wants this done and I think that means your client needs to turnover whatever devices apply based on our discovery requests.

You have not served a discovery request of that breadth, and I would object if you did. The RFPs that you served on May 13, 2026, refer to “your current I-phone, all phones you have 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.”

The motion for sanctions that you filed on May 29, 2026, refers only to Ms. Davis’s second iPhone that was mentioned during her deposition, and the Court’s minute-entry order that was sent yesterday at 11:23 a.m. instructs us to confer on the “process for extraction of the second phone and a new expert.”

You are (once again) moving the goalposts at the last minute by including a demand for “children’s toys” that “have recording technology” when you never served a discovery request for that and never raised that issue before the Court. The stipulation will be limited to the production of the second cell phone and the appointment of a forensics expert.

(8) I am willing to drop paragraphs 10 and 11 of my initial draft from the stipulation but do not interpret that as a concession that I am no longer demanding that you and George Vasiliou turn over your communications and the data that you accessed from my client’s iPhone in violation of the Court’s order. That is fine.

Our status report to the Court is due in 40 minutes. I will draft a report informing the Court that we have exchanged proposals and I will attaching our e-mailed correspondence. I will also ask the Court to allow us to continue negotiating until Friday, June 12. Let me know if you object to this approach. I’d like to get this finalized sooner in the sense that we either come to full agreement on these issues or we decide we will submit our difference in a Joint Status Report. Let’s get this resolved one way or another by end of

day tomorrow. As for informing the Court of our continued discussions, please send me the proposed correspondence with the Court before you submit it.

—Jonathan

On Jun 9, 2026, at 8:25 AM, Moscowitz, Barry <BMoscowitz@thompsoncoe.com> wrote:

Attached are the following documents:

- A redlined version reflecting our changes to the draft Joint Report
- A clean version reflecting our changes to the draft Joint Report
- A propose initial ESI protocol

We are good with the filing of all the attached documents, but if you have any changes or would like to discuss further, feel free to give me a call.

Take care.

<image001.png>

Barry Moscowitz • Partner
700 North Pearl Street, 25th Floor, Dallas, TX 75201
o: 214-871-8275 • m: 214-909-7236
[bio](#) • [vCard](#) • [web](#)

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Monday, June 8, 2026 11:40 AM
To: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>
Cc: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>
Subject: draft stipulation and order

Counsel:

Our draft stipulation and order is attached. Comments and proposed edits are welcome. Please make any edits in redline.

—Jonathan

Jonathan F. Mitchell
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111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
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papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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ATTORNEY WORK PRODUCT**

<Davis v. Coopriders Joint Status Report BAM Edits (6.9.26) (clean).docx><Davis v.
Coopriders Joint Status Report (Def redlines).docx>

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

LIANA DAVIS,

Plaintiff,

V.

CHRISTOPHER COOPRIDER, AID
ACCESS GMBH & REBECCA GOMPERS,

Defendants.

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CIVIL ACTION NO. 2:25-CV-220

STIPULATED ELECTRONIC DISCOVERY AGREEMENT

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Liana Davis, and Defendant Christopher Coopriders (collectively, the *Parties*, and each, a *Party*), by and through their respective counsel in the above-captioned action, stipulate and agree that the following stipulation (the *ESI Stipulation*) shall govern the preservation, search, and production of Electronically Stored Information (*ESI*) in this matter.

A. SCOPE

1. This ESI Stipulation shall govern the production of documents and ESI, as described in Federal Rules of Civil Procedure 26, 33, and 34.
2. The Parties are aware of the importance the Court places on cooperation and commit to cooperate in good faith throughout the matter.
3. Electronic discovery will be limited to documents and ESI in the Parties' custody, possession, or control, which were created in connection with the incident made basis of this lawsuit, on or about **April 5, 2025**. Nothing herein expands a Party's obligations beyond those imposed by the Federal Rules of Civil Procedure and applicable orders of the Court.

B. SEARCH TERMS, CUSTODIANS, AND STIPULATION/PROPOSED ORDER

1. The Parties agree to meet and confer and attempt to reach agreement as to the method of searching, and the words, terms, and phrases to be used to locate and identify potentially responsive ESI. The Parties shall also attempt to agree on the timing and conditions of any additional searches that may become necessary in the normal course of discovery.

2. The Parties agree to meet and confer to identify the custodians whose email and other ESI will be searched, and any other electronic systems that will be searched, using the agreed search terms.

3. The Parties will confer regarding the appointment of a neutral forensics expert to securely hold any device images or other data evidence for the duration of the case, subject to Court approval. The neutral will not examine, search, or provide access to any data absent a signed ESI Order of the Court and advance notice to all Parties with Court approval of any proposed communications or access. At the conclusion of the case, the neutral shall destroy all data evidence and passwords and provide a certification of destruction.

C. DOCUMENT PRODUCTION

1. Production Format. Documents and ESI derived from electronic or other computer-based media (*e.g.*, e-mails, Microsoft Office files) will be produced as Bates-labeled documents in PDF format for the alleged time period, as described in Exhibit 1.

2. The Parties Right to Object to Production Format. Each Party reserves the right to object to production of documents in the format specified herein to the extent that production in such format is impracticable or unreasonably burdensome or expensive. However, the objecting Party shall have an obligation to disclose the details concerning the alleged impracticability, unreasonable burden, and/or cost.

3. Metadata. The Parties agree to meet and confer to identify ESI metadata fields that will be produced in connection with damage claims.

4. Extracted Text. All documents and ESI produced by The Parties will be accompanied by searchable text files or the text contained in the produced documents must be searchable through Optical Character Recognition (*OCR*). The accompanying text files or extracted text should include all un-redacted text within a document. Redacted text should not be OCRed or contained within a text file.

5. Structured Databases. The Parties agree to meet and confer to agree upon the production of data from structured databases in existing report formats, or report formats that can be developed without undue burden, if applicable.

6. De-Duplication. A Party is only required to produce a single copy of a responsive document. The Parties may de-duplicate stand-alone documents or entire document families globally.

7. Encrypted or Password-Protected Documents. The Parties will ensure that documents and ESI produced in native form are decrypted (or that passwords are supplied).

D. MANAGEMENT OF ATTORNEY-CLIENT AND WORK PRODUCT PRIVILEGE

1. Nothing in this ESI Protocol shall require disclosure of information that counsel contends is protected from disclosure by the attorney-client privilege, the work-product immunity, or any other legally cognizable privilege. If information subject to a claim of attorney-client privilege, work-product immunity, or any other applicable privilege is inadvertently or mistakenly produced, such production shall in no way prejudice or otherwise constitute a waiver of, or estoppel as to, any claim of privilege or immunity for such information.

2. If a Party has inadvertently or mistakenly produced a document subject to a claim of immunity or privilege, upon request by the Producing Party within three (3) business days of discovery of such inadvertent or mistaken production, the document for which a claim of inadvertent production is made shall be returned within three (3) business days of receipt of such request by the Receiving Party, and all copies of such document shall be destroyed by the Receiving Party to the extent reasonably practicable, and the Receiving Party shall not use such information for any purpose other than in connection with a motion to compel.

3. To the extent during the interim that any privileged information has been disclosed to persons not entitled to view it, and the Producing Party has requested its return within the time permitted by this Order, the Receiving Party shall use its best efforts to retrieve the privileged information from such person(s). If the privileged information cannot be retrieved by the Receiving Party, the Receiving Party must so notify the Producing Party, which may then move the Court for an order compelling production of the material.

E. OTHER

1. Each party will presumptively bear its own costs of production. However, each Party reserves the right to seek reimbursement for costs associated with collection, review, or production of documents or ESI.

2. Nothing in this ESI Stipulation shall be interpreted to require disclosure of irrelevant information or relevant information protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity, or to limit a party's right to conduct a review of documents or ESI for relevance, responsiveness and/or segregation of privileged and/or protected information before production, irrespective of the electronic search terms or other technologies used to identify potentially relevant documents or ESI. The Parties do

not waive any objections as to the production, discoverability, admissibility, or confidentiality of documents and ESI.

3. Nothing in this ESI Stipulation will affect any other obligations of the Parties to preserve documents or information for other purposes, such as pursuant to court order, administrative order, statute, regulation or in response to other pending or anticipated litigation. In addition, nothing in this ESI Stipulation will eliminate or alter any Party's obligation to retain native format copies, including associated metadata, of all documents produced in this litigation, together with the original hard copy documents for all paper discovery produced in this litigation.

4. The Parties will use their best efforts to comply with and resolve any differences concerning compliance with any provision/s of this ESI Stipulation to include, but not limited to, any issues pertaining to the Parties' agreement on the search terms. If a producing party cannot comply with any aspect of this ESI Stipulation, such party will inform the requesting party in writing before the time of production why compliance with the ESI Stipulation is unreasonable or not possible. No party may seek relief from the Court concerning compliance with this ESI Stipulation until it has met and conferred with the other party pursuant to those Rules requiring a good faith effort to resolve or narrow the area of disagreement.

5. This ESI Stipulation may be revised or amended by agreement between the Parties, and each Party reserves the right to request the Court modify this ESI Stipulation.

6. Counsel executing this ESI Stipulation warrant and represent that they are authorized to do so on behalf of themselves and their respective clients. IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Respectfully submitted,

/s/ Beth Klein

Beth Klein
Colorado Bar No. 17477
S.D. Tex. Bar No. 3934133
Beth Klein, P.C.
350 Market Street, Suite 310
Basalt, Colorado 81621
Email beth@bethklein.com
Phone 303-448-8884

- AND -

Mikel C. Watts
Texas State Bar No. 20981820
Federal Bar ID: #12419
Mikel@wattsllp.com
WATTS LAW FIRM, LLP
811 Barton Springs #725
Austin, Texas 78704
Telephone: (512) 479-0500
Facsimile: (512) 479-0501

AND -

Barry A. Moscovitz
Texas State Bar No. 24004830
Federal Bar ID No. 31054
bmoscovitz@thompsoncoe.com
THOMPSON, COE, COUSINS & IRONS, LLP
700 North Pearl Street, 25th Floor
Dallas, Texas 75201
Telephone: (214) 871-8200
Facsimile: (214) 871-8209

Victoria L. Jimenez
Federal Bar No. 2522937
State Bar No. 24060021
vjimenez@thompsoncoe.com
4400 Post Oak Parkway, Suite 1000
Houston, Texas 77027
Telephone: (713) 403-8210
Fax: (713) 403-8299

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2026, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/ Beth Klein

Beth Klein

EXHIBIT 1

1. Relevant Time Period

- Unless otherwise agreed or ordered, the Relevant Period shall be January 1, 2025 through May 31, 2025, with a presumption favoring inclusion of data from January 31, 2025 through April 6, 2025 as directly tied to the pleaded events. On April 5–6, 2025 alleged poisoning event links to custodians Coopriders and Davis; devices/accounts include cell phones, text messages, PayPal, Uber; locations include Davis’s home, Foxfire Condominiums, Corpus Christi Medical Center Bay Area; time window anchored by January 31, 2025 through April 6, 2025.

2. Documents/ESI to Be Produced

- All text/SMS/RCS/iMessage communications between Plaintiff and Defendant from November 25, 2024 through April 12, 2025, including attached media (audio, photos, screenshots) and metadata.
- Audio recordings made on April 5–6, 2025 related to the alleged incident, including the 29-second recording.
- Device photographs and images of medication/pill containers, labels, receipts, and packaging (including any showing “Aid Access,” “mifepristone,” and “misoprostol”), with original capture metadata.
- Call logs and message logs for April 5–6, 2025 reflecting attempts to contact, missed calls, and timestamps for both parties.
- Location data and device analytics for April 5–6, 2025 sufficient to show approximate device location/movement (e.g., device GPS history, Apple/Google location history), subject to Court order.
- Hospital/ER admission-discharge records, triage notes, and timestamped visit documentation for the April 6, 2025 presentation at Corpus Christi Medical Center Bay Area, with any chain-of-custody records for items provided to police.
- Forensic images and associated inventories previously created of each party’s relevant devices (cell phones, tablets, computers), to be transferred by prior examiners to the new neutral custodian as ordered.
- Cloud-stored data for Plaintiff relevant to the communications, media, and recordings at issue, with access credentials or tokens provided to the neutral custodian as ordered.
- Receipts, order confirmations, shipping/tracking data for any abortion-inducing drugs allegedly purchased or received February 1–March 1, 2025.
- Ultrasound reports and related scheduling/clinical communications around March 21, 2025, including any follow-up directions and lab timing communications.

Dupen, Craig

From: Dupen, Craig
Sent: Tuesday, July 21, 2026 10:32 AM
To: Beth Klein; Jonathan Mitchell
Cc: Moscovitz, Barry; Mikal Watts; Talcott Franklin; Jimenez, Victoria; Hamby, Oliver; John C. Sullivan; Cliff P. Riley
Subject: RE: Davis v Coopriden) 10017249 [IMAN-TCLAW.FID2728850]

Jonathan,

Array address confirmed below—as we discussed with the Court yesterday, I’m also happy to hop on a call with you to them if you would like to discuss any additional logistics for this transfer (and also accessing Ms. Davis’s cloud data).

In terms of hammering out an ESI order on search parameters, scope, etc. and resolving some of the pending objections and ESI discovery requests or getting the Court to rule on those, it might be easiest as a first step if we just had a call to talk through what we can agree on? I’m fairly open tomorrow morning or Thursday if you have some time.

Thanks,



Craig Dupen • Partner
700 North Pearl Street, 25th Floor, Dallas, TX 75201
o: 214-880-2703
[bio](#) • [vCard](#) • [web](#)

From: Damon O'Connell <Damon.OConnell@trustarray.com>
Sent: Tuesday, July 21, 2026 10:16 AM
To: Dupen, Craig <CDupen@thompsoncoe.com>; Beth Klein <beth@bethklein.com>; Jonathan Mitchell <jonathan@mitchell.law>
Cc: Moscovitz, Barry <BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Arlene Clancy <arlene_rodriguezclancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>
Subject: RE: Davis v Coopriden) 10017249 [IMAN-TCLAW.FID2728850]

That is the correct address. If you wanted to be very clear, please use this address:

Array
ATTN: Forensics - **46960**
5508 US Hwy 290 West
Suite 350
Austin, TX 78735

Best regards,

Damon



Damon O'Connell
VP of Business Development
M [512.653.7387](tel:512.653.7387)
trustArray.com

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From: Dupen, Craig <CDupen@thompsoncoe.com>

Sent: Tuesday, July 21, 2026 10:11 AM

To: Damon O'Connell <Damon.OConnell@trustarray.com>; Beth Klein <beth@bethklein.com>; Jonathan Mitchell <jonathan@mitchell.law>

Cc: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Arlene Clancy <arlene_rodriguezclancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>

Subject: RE: Davis v Cooprider) 10017249 [IMAN-TCLAW.FID2728850]

Hello Damon,

Thanks for your email—just to clarify though, until a further order from the Court with some additional direction as to the proper scope, search terms, time frames, etc. Array is only supposed to preserve the data from the devices (please see #8 and #9 for instance in the attached order). We will endeavor to work with the Court to get that next order finalized in the near future. Also, Plaintiff's counsel needs to send you an additional cell phone from Ms. Davis. Could you please confirm that they can send that phone to the address:

Array
ATTN: Forensics
5508 US Hwy 290 West
Suite 350
Austin, TX 78735

Jonathan, I'll reach out to you separately so we can get the ball rolling on the ESI order again.

Thanks,

THOMPSON
EST COE 1951
75 YEARS

Craig Dupen • Partner
700 North Pearl Street, 25th Floor, Dallas, TX 75201
o: 214-880-2703
[bio](#) • [vCard](#) • [web](#)

From: Damon O'Connell <Damon.OConnell@trustarray.com>
Sent: Monday, July 20, 2026 12:26 PM
To: Beth Klein <beth@bethklein.com>; Jonathan Mitchell <jonathan@mitchell.law>
Cc: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>; Arlene Clancy <arlene_rodriguezclancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>
Subject: RE: Davis v Coopridr) 10017249

We have received one laptop, and it was imaged and released. We received a hard drive last week via Fedex, but the contents of the drive have not been reviewed. I would like to get a scoping call together with my team. Would you mind sharing some dates and times you all would be available to discuss?

Best regards,

Damon



Damon O'Connell
VP of Business Development
M [512.653.7387](tel:512.653.7387)
trustArray.com

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From: Beth Klein <beth@bethklein.com>
Sent: Thursday, July 16, 2026 8:25 PM
To: Jonathan Mitchell <jonathan@mitchell.law>; Jessica White <Jessica.White@trustarray.com>; Damon O'Connell <Damon.OConnell@trustarray.com>; Russell Chozick <Russell.Chozick@trustarray.com>
Cc: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>; Arlene Clancy <arlene_rodriguezclancy@txs.uscourts.gov>
Subject: Davis v Coopridr) 10017249

I am confirming that the following evidence has been delivered:

1. To Array. Davis Phone No 1, Coopridr Phone and 2 computer mirror images.
2. To Mitchell. The Davis Phone No. 1 extraction.

Beth Klein
Via mobile

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Thursday, 16 July 2026 19:01:46

To: Jessica White <Jessica.White@trustarray.com>; Damon O'Connell <Damon.OConnell@trustarray.com>; Russell Chozick <Russell.Chozick@trustarray.com>

Cc: Moscowitz, Barry <BMoscowitz@thompsoncoe.com>; Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Dupen, Craig <CDupen@thompsoncoe.com>; Arlene Clancy <arlene_rodriguezclancy@txs.uscourts.gov>

Subject: Re: Invoice from Array - Beth Klein (Davis v Coopriders) 10017249

Jessica:

Thank you helping us finalize the contract.

I am still waiting for instructions from Array on how Ms. Davis should provide her second cell phone for forensics imaging. Judge Morales ordered us to certify that the device had been provided to array no later than tomorrow, July 1, 2026.

—Jonathan

On Jul 15, 2026, at 11:19 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Jessica:

I'm following up on this. Judge Morales ordered us to finalize and execute the contract on or before Friday, July 17, 2026.

My client also needs to provide her second cell phone to Array LLC by July 17, 2026. Please let us know how we should provide that device.

Thank you for considering this.

—Jonathan

On Jul 11, 2026, at 7:09 PM, Jonathan Mitchell <jonathan@mitchell.law> wrote:

Jessica:

I have added my address and contact information in redline to this document. I have also attached a copy of Judge Morales's order of July 10, 2026, which appoints Array LLC as custodian of the data.

We will need to arrange for my client (Liana Davis) to deliver her second cell phone to Array for imaging. The judge imposed a deadline of July 17, 2026, for us to deliver the phone. Please let me know how we should provide the phone to Array.

Please let me know if you need anything further from me.

—Jonathan

<AMENDED AND RESTATED SERVICE AGREEMENT.docx>
<101 - ORDER granting in part and denying in part [70] Motion for Protective Order (7.10.2026) (CLEAN).pdf>

On Jun 17, 2026, at 3:17 PM, Jessica White
<Jessica.White@trustarray.com> wrote:

Beth, Barry, Jonathan,

I created a draft Amended and Restated Service Agreement to reflect the new billing arrangement. To finalize the draft, I have a few questions:

- **Jonathan:** Please add Mitchell Law PLLC's office address for the agreement
- **Beth:** Confirmation that you will remain responsible for any outstanding invoices for work performed prior to the effective date
- **All:**
 - * Preferred effective date for the billing changeover.
 - * project authority – will Array take direction from Beth Klein's firm or will you all collaborate for

direction? Take a look at #6 for the two options or edit as you see fit.

The attached draft names Thompson Coe and Mitchell Law as the financially responsible parties, with Array issuing separate invoices to each firm for its 50% share.

Please feel free to provide edits to more accurately reflect the terms, this is just a starting doc. If you prefer to meet to discuss, I'm happy to set something up.

Thank you,

Jessica



Jessica White
Associate General Counsel
trustArray.com

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<AMENDED AND RESTATED SERVICE AGREEMENT.docx>

Jonathan F. Mitchell
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law
papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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jonathan@mitchell.law
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From : beth@bethklein.com

To jonathan@mitchell.law; mikal@wattsllp.com; bmoscowitz@thompsoncoec.com;
: ohamby@thompsoncoec.com; vjimenez@thompsoncoec.com; cdupen@thompsoncoec.com

Sent : 6/14/2026 11:37PM

Subject : RE: Discovery Conferral - Deposition Dates, Insurance Coverage Information, Damages Disclosures

Jonathan,

I am not going to litigate on emails or otherwise unproductively engage. I stand by every statement which is backed with evidence.

If you wish to move the ball forward, please advise how you wish to proceed with the pending ESI discovery and your objections. Do we need to schedule a hearing to go through and have the court rule on every objection before the forensics can proceed? You say: "I have objected to the discovery requests that you served on May 13, 2026, so you have no right to access any material described in those requests unless the Court overrules my objections or I withdraw them." Let me know in writing your position so we can get this to the Court expeditiously. Barry has been in an arbitration, and I am out of the United States. Written conferral is preferred.

Please review the RFP's:

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

RESPONSE: Ms. Davis did not start using an app to document her menstrual cycle until October 2025. Ms. Davis 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)

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621



From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Sunday, June 14, 2026 10:22 PM
To: Beth Klein <beth@bethklein.com>; Mikal Watts <mikal@wattsllp.com>; Moscowitz, Barry <bmoscowitz@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>
Subject: Re: Discovery Conferral - Deposition Dates, Insurance Coverage Information, Damages Disclosures

Beth:

You have no evidence whatsoever that Ms. Davis “wiped” her phone, and you have presented no evidence of this to me or to the Court. You are making this up and defaming my client.

If you subpoena Ms. Amoroso or Ms. Ziarko, then we will move to quash. It is your decision whether to issue the subpoenas but I have warned you that we will move to quash the subpoenas if you proceed.

I am still thinking over how to handle the payments to Array. You are lying when you accuse of my client of hiding evidence. She has not “hidden” anything and you cannot identify a single piece of evidence that she has “hidden.” I am not going to agree to a payment-sharing arrangement that is based on a false premise. I think it would be helpful if I negotiated this issue with a different member of your legal team. We can work on a stipulated agreement with respect to payment and present it to the Court. The invoice isn’t due until June 30, so we have some time to work this out.

You are also lying when you claim that I have said that we “must have a hearing in every single discovery request to which you have objected (which is every single discovery request made in this case).” I have never said anything of the sort, and I have not objected to “every single discovery request made in this case.” What I said is that we are available to meet and confer about the discovery objections that I raised, which is a basic professional courtesy that objecting lawyers extend whenever a discovery dispute arises.

The falsehoods that appear in nearly every e-mail that you send accomplish nothing except to show that you are an untruthful attorney. I do not understand why you think this behavior serves your interests or the interests of your client. But if this is how you want to litigate this case, then I am capable of learning.

Please try to remember to include my co-counsel (Tal Franklin, John Sullivan, and Cliff Riley, all cc’d above) on our future correspondence.

—Jonathan

On Jun 14, 2026, at 3:12 AM, Beth Klein <beth@bethklein.com> wrote:

Jonathan,

Every single statement in my email is backed with substantial facts. I disagree with your over-the-top comments, but I choose to present my argument to the Court and seek to find common ground to continue to move this case to conclusion.

We will schedule the three depositions and subpoena the witnesses.

How do you wish to make your share of the payment to Array? I insist that you be billed directly and you that sign the contract with Array. Obtaining esi discovery was only necessitated because your client constantly hid key evidence and lied about the existence of text messages and other documents. All these expenses are of your clients making.

Since it's your position that we must have a hearing in every single discovery request to which you have objected (which is every single discovery request made in this case) we will get that scheduled to take place when I return to the United States in July and can participate.

Thank you.

Get [Outlook for iOS](#)

From: Jonathan Mitchell <jonathan@mitchell.law>

Sent: Sunday, 14 June 2026 10:47:20

To: Beth Klein <beth@bethklein.com>

Cc: Mikal Watts <mikal@wattsllp.com>; Moscovitz, Barry <bmoscovitz@thompsoncoecoe.com>; Hamby, Oliver <ohamby@thompsoncoecoe.com>; Jimenez, Victoria <vjimenez@thompsoncoecoe.com>; Dupen, Craig <cdupen@thompsoncoecoe.com>

Subject: Re: Discovery Conferral - Deposition Dates, Insurance Coverage Information, Damages Disclosures

Beth:

There is quite a bit in this e-mail. I will respond to each paragraph below.

On Jun 13, 2026, at 11:05 PM, Beth Klein
<beth@bethklein.com> wrote:

Mr. Mitchell,

Ms. Davis has violated multiple court orders and filed two materially false declarations with the Court. She wiped her phone minutes prior to the phone being turned over to the expert, further obstructing discovery and drawing a likely trial Instruction of an inference of her fault. She concealed the existence of the second phone with the critical recording that we have formally requested in discovery.

That is absolutely false and defamatory, and you know it. Ms. Davis has never “wiped” her phone or spoliated evidence, and you have no evidence that she did. She did not “conceal the existence” of her second phone, as she candidly admitted to its existence in her deposition. We have already produced the audio recordings of that night, so you have not been prejudiced in the slightest by the fact that Ms. Davis has not yet produced her second phone to a forensics expert. You make up falsehoods about Ms. Davis to smear her character. I will call out your lies every time you put them in an e-mail or court filing.

We can now take the deposition of Detective Manzano per the magistrate’s order. This will be taken live in Corpus Cristi. Please provide dates in July and make sure that Blake Green is copied to facilitate the scheduling. Blake Green
<blakeg@corpuschristitx.gov>

I do not represent Detective Manzano so I will not be defending his deposition, but I would like to attend the deposition over Zoom and I intend to ask him some questions on the record when you conclude your questioning.

Right now I am generally available in the month of July, but it is possible though not certain that I will be traveling July 6–10, so I request that you not schedule any depositions during that week.

Two additional requests for deposition dates have been pending for months. I will set these depositions at my convenience in July if I do not receive dates from you immediately: Ami Amoroso (to be taken live in Georgia) and Mary Anna Ziarko (too be taken live in Corpus Cristi). Mary Anna Ziarko was physically present at the Davis household the night of April 5-6. Ms. Ziarko spoke to and closely observed Ms. Davis around midnight and was likely in the tv room, dining room and kitchen.

I have not been retained by either Ms. Amoroso or Ms. Ziarko. If you schedule them for depositions, I would like to attend the deposition over Zoom. It is possible that I will ask them questions on the record after you conclude your questioning.

I am generally available in July although I ask that you not schedule any depositions during July 6–10 because I might be traveling that week.

I am further conferring with you to reach an agreement that the three artifacts recovered from Ms. Davis's phone that were disclosed on May 31, 2026 should be made public: the confirmation that Ms. Davis changed key witness Amoroso's name in contacts, her menstrual and pregnancy tracking notes (that should have been produced in rfp's) and the report - Exhibit 40 . All these artifacts are responsive to specific discovery requests, are not privileged and do not meet the *June* test for permanent sealing set forth in the protective order. This evidence will be re-discovered by Array in a matter of days.

We will not agree to make any of this public. You obtained this material from Ms. Davis in violation of the Court's order of May 14, 2026, and we will be seeking sanctions from the Court that will prevent you from using any material that you unlawfully obtained from Ms. Davis's phone.

This material that you describe is not responsive to any discovery request. I have objected to the discovery requests that you served on May 13, 2026, so you have no right to access any material described in those requests unless the Court overrules my objections or I withdraw them.

Array must be paid immediately, and the court ordered that investigator fees will be split equally in its May 14, 2026, order. You have the bill; confirm your payment.

The Court's order of May 14, 2026, does not say anything about how the fees with Array will be split. It says only that the fees for Mr. Vasiliou will be shared equally. Don't misrepresent the Court's order.

The invoice for Array says payment is due on June 30, 2026, so don't tell me that Array "must be paid immediately." That is also a misrepresentation.

Barry has proposed a 50/50 split, and I still considering whether to agree to that. You were the ones who demanded Ms. Davis's computer, so it is not clear to me why we should bear any of these costs. But I am still thinking it over.

Your boilerplate general objections to the ESI request are not appropriate and should be withdrawn. Whatever logic may have led to the development of a laundry list of general objections, courts have made clear that they are ineffective for much more than wasting space and annoying judges and that lawyers should stop interjecting them. See, e.g., *Fischer v. Forrest*, 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (Peck, Mag.); *Sagness v. Duplechin*, 2017 WL 1183988, at *2 (D. Neb. Mar. 29, 2017) (Zwart, Mag.); *Liguria Foods, Inc. v. Griffith Labs., Inc.*, 2017 WL 976626 (N.D. Iowa Mar. 13, 2017); *Cafaro v. Zois*, 2016 WL 903307, at *1 (S.D. Fla. Mar. 9, 2016) ("Boilerplate objections may also border on a frivolous response to discovery requests." citing *Steed v. Everhome Mortg. Co.*,

308 F. App'x 364, 371 (11th Cir. 2009)); *Heller v. City of Dallas*, 303 F.R.D. 466, 482-85 (N.D. Tex. 2014) ("Counsel should cease and desist from raising these free-standing and purportedly universally applicable 'general objections' in responding to discovery requests."); *Waldrop v. Discover Bank (In re Waldrop)*, 560 B.R. 806, 810 (Bankr. W.D. Okla. 2016).

Should you possess further evidence responsive to all discovery served to date, please review all evidence on all devices and produce it within 7 days.

I will not withdraw those objections. Nor will I produce discovery in response to a request to which I have objected. If you would like to schedule a meet-and-confer session to discuss particular objections, please let me know.

To my knowledge, I believe that we have produced all documents responsive to the discovery requests that you served before May 13, 2026. But if I uncover additional responsive materials that were not previously produced, I will of course produce them.

I have asked you for insurance coverage information from your client's homeowners' policy which should have been disclosed. Please provide the declarations page for the Homeowner's Insurance policy along with any reservations of rights and coverage communications.

I will ask my client to provide her homeowner's insurance policy and I will produce the required information when I obtain it.

Please supplement your calculations of damages in your disclosures and provide all supporting documents. If you are abandoning any category of damages, please formalize your position in your

disclosures. Your client testified in her deposition that she isn't seeking the amount she paid for medical bills, had no idea of any subrogation interest, and she isn't seeking a "bounty." Your client testified that is seeking damages for the family court's order removing her children in April 2025 and Mr. Coopriders cooperating with Judge Madrigal; this isn't a claim in the case and unlikely a valid claim. Let me know if we need to file a MSJ on this issue.

We're not abandoning any category of damages. Ms. Davis is not a lawyer so she is not going to know which categories of damages to pursue in a wrongful-death case such as this. I will work on preparing a supplemental disclosure.

Thank you.

Beth Klein

Phone 303-448-8884

beth@bethklein.com

Fax 720-307-2816

[Documentary Website](#)

350 Market Street, Suite 310 Basalt CO 81621

<image001.png>

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papers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=791842

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ATTORNEY WORK PRODUCT**

Dupen, Craig

From: Jake Nee <Jake.Nee@trustarray.com>
Sent: Friday, August 21, 2026 1:32 PM
To: Jonathan Mitchell
Cc: Dupen, Craig; Beth Klein; Austin Juarez; Damon O'Connell; Moscovitz, Barry; Mikal Watts; Talcott Franklin; Jimenez, Victoria; Hamby, Oliver; John C. Sullivan; Cliff P. Riley; Arlene Clancy; Forensics
Subject: Re: Davis v Coopriden) 10017249 [IMAN-TCLAW.FID2728850]

Hi Jonathan,

After doing some further testing with iCloud and our forensics tools, our forensic tools are not able to collect the messaging data directly from iCloud due to changes on Apple's part. This has been a challenge across the industry recently and is consistent across multiple forensic tools.

If the reasoning for collecting from iCloud is to ensure all available messaging data is captured, we would recommend reviewing the iCloud settings on the iPhone to see if her messages were being saved to iCloud. If message syncing is not enabled, then all messages would be stored locally on her mobile device, and a separate iCloud collection would be duplicative. The device is currently off and we will need to turn on and unlock the device in order to confirm whether or not these settings are enabled.

If iCloud message syncing is enabled, the alternate method we recommend is to restore the backup to a blank iPhone here in our lab, due to the limitations with collecting directly from iCloud. We would then perform an extraction from the lab iPhone.

Please let us know if there are any questions or if you would like us to join a call this afternoon to discuss this collection strategy further.

Thanks,
Jake



Jake Nee
Forensics Project Manager
[trustArray.com](mailto:Jake.Nee@trustarray.com)

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From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Friday, August 21, 2026 2:05 PM
To: Jake Nee <Jake.Nee@trustarray.com>
Cc: Dupen, Craig <CDupen@thompsoncoe.com>; Beth Klein <beth@bethklein.com>; Austin Juarez <victor.juarez@trustarray.com>; Damon O'Connell <Damon.OConnell@trustarray.com>; Moscovitz, Barry

<BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>
Subject: Re: Davis v Coopridr) 10017249 [IMAN-TCLAW.FID2728850]

Ms. Davis is possibly available at 2:30-3:00 central time. Does that work for everyone else?

On Aug 18, 2026, at 1:30 PM, Jake Nee <Jake.Nee@trustarray.com> wrote:

Hi Craig and Jonathan,

I will circulate an invite to the broader group for this Friday at 11am central. Please let us know if this time no longer works.

Thanks,
Jake



Jake Nee
Forensics Project Manager
trustArray.com

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From: Dupen, Craig <CDupen@thompsoncoe.com>
Sent: Tuesday, August 18, 2026 1:18 PM
To: Jake Nee <Jake.Nee@trustarray.com>; Jonathan Mitchell <jonathan@mitchell.law>; Beth Klein <beth@bethklein.com>
Cc: Austin Juarez <victor.juarez@trustarray.com>; Damon O'Connell <Damon.OConnell@trustarray.com>; Moscovitz, Barry <BMoscowitz@thompsoncoe.com>; Mikal Watts <mikal@wattsllp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>
Subject: RE: Davis v Coopridr) 10017249 [IMAN-TCLAW.FID2728850]

Jake and Jonathan,

How about we lock in 2pm central on Thursday, or 11am central on Friday?

Thanks,

<image001.png>

Craig Dupen • Partner
700 North Pearl Street, 25th Floor, Dallas, TX 75201
o: 214-880-2703
[bio](#) • [vCard](#) • [web](#)

From: Jake Nee <Jake.Nee@trustarray.com>
Sent: Tuesday, August 18, 2026 10:31 AM
To: Dupen, Craig <CDupen@thompsoncoe.com>; Jonathan Mitchell <jonathan@mitchell.law>; Beth Klein <beth@bethklein.com>
Cc: Austin Juarez <victor.juarez@trustarray.com>; Damon O'Connell <Damon.OConnell@trustarray.com>; Moscovitz, Barry <BMoscovitz@thompsoncoe.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>
Subject: Re: Davis v Coopriden) 10017249 [IMAN-TCLAW.FID2728850]

Hi Craig and Jonathan,

Thank you for providing your availabilities this week. Once we have a time that works for all of the law firms involved, we will circulate a meeting invite.

Thanks,
Jake



Jake Nee
Forensics Project Manager
trustArray.com

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From: Dupen, Craig <CDupen@thompsoncoe.com>
Sent: Tuesday, August 18, 2026 11:29 AM
To: Jonathan Mitchell <jonathan@mitchell.law>; Beth Klein <beth@bethklein.com>
Cc: Jake Nee <Jake.Nee@trustarray.com>; Austin Juarez <victor.juarez@trustarray.com>; Damon O'Connell <Damon.OConnell@trustarray.com>; Moscovitz, Barry <BMoscovitz@thompsoncoe.com>; Mikal Watts <mikal@wattslp.com>; Talcott Franklin <tal@tfpc.me>; Jimenez, Victoria <VJimenez@thompsoncoe.com>; Hamby, Oliver <OHamby@thompsoncoe.com>; John C. Sullivan <john.sullivan@the-sl-lawfirm.com>; Cliff P. Riley <cliff.riley@slfirm.com>; Arlene Clancy <Arlene_RodriguezClancy@txs.uscourts.gov>; Forensics <forensics@trustarray.com>
Subject: RE: Davis v Coopriden) 10017249 [IMAN-TCLAW.FID2728850]

Jake and Jonathan,