

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**ALYSSON MILLS, IN HER CAPACITY AS
RECEIVER FOR ARTHUR LAMAR
ADAMS AND MADISON TIMBER
PROPERTIES, LLC**

PLAINTIFF

VS

CAUSE NO. 3:19-cv-364-CWR-FKB

**THE UPS STORE, INC.; HERRING
VENTURES, LLC d/b/a THE UPS STORE;
AUSTIN ELSEN; TAMMIE ELSEN; COURTNEY
HERRING; DIANE LOFTON; CHANDLER
WESTOVER; RAWLINGS & MACINNIS, PA;
TAMMY VINSON; and JEANNIE CHISHOLM**

DEFENDANTS

**JOINDER TO [62] THE UPS STORE INC.'S OPPOSITION TO RECEIVER'S MOTION
FOR PROTECTIVE ORDER**

COME NOW Defendants, Herring Ventures, LLC d/b/a The UPS Store, Austin Elsen, Tammie Elsen, Courtney Herring, Diane Lofton and Chandler Westover, by and through their undersigned counsel of record, Rushing & Guice, P.L.L.C., and file this, their Joinder to [62] The UPS Store Inc.'s Opposition to [57] Plaintiff's Motion for Protective Order, and would show unto the Court the following:

1. On or about December 13, 2019 Plaintiff in this matter, Alysson Mills, in her capacity as Receiver for Arthur Lamar Adams and Madison Timber Properties, LLC, filed [57] her Motion for Protective Order.

2. On or about December 27, 2019, Defendant, The UPS Store, Inc., filed [62] its Memorandum in Opposition to Plaintiff's Motion for Protective Order, wherein it was stated "The Herring Ventures Defendants and Rawlings & MacInnis Defendants join The UPS Store, Inc. ("TUPPS, Inc.") in opposing Plaintiff's motion".

3. Defendants Herring Ventures, LLC d/b/a The UPS Store, Austin Elsen, Tammie Elsen, Courtney Herring, Diane Lofton and Chandler Westover would affirm that they do, in fact, join in [62] The UPS Store, Inc.'s Memorandum in Opposition to Plaintiff's Motion for Protective Order, and would show that the relief requested in Plaintiff's Motion should be denied in that it would create an undue burden upon Defendants, and would therefore be prejudicial against them.

WHEREFORE, PREMISES CONSIDERED Defendants Herring Ventures, LLC d/b/a The UPS Store, Austin Elsen, Tammie Elsen, Courtney Herring, Diane Lofton and Chandler Westover would ask that this court deny Plaintiff's Motion for Protective Order, that they grant the relief requested in [62] The UPS Store, Inc.'s Memorandum in Opposition to Plaintiff's Motion for Protective Order, and for any further relief the Court may find just and proper in the premises.

Respectfully submitted this 2nd day of January, 2020.

RUSHING & GUICE, P.L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of January, 2020, a copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the court's electronic filing system.

SO CERTIFIED this 2nd day of January, 2020.

/s/ R. SCOTT WELLS

R. SCOTT WELLS

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