

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

v.

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

Defendants.

**DEFENDANTS RAWLINGS AND MACINNIS, P.A., TAMMY VINSON,  
AND JEANNIE CHISHOLM'S JOINDER IN THE UPS STORE, INC.'S  
MOTION FOR ENTRY OF PROTECTIVE ORDER**

Defendants Rawlings & MacInnis, P.A., Tammy Vinson, and Jeannie Chisholm (the "R&M Parties") hereby join in The UPS Store, Inc.'s ("TUPSS") Motion for Entry of Protective Order [Doc. #59], its Memorandum in Support of Motion for Entry of Protective Order [Doc. #60], and its Memorandum in Opposition to Plaintiff's Motion for Protective Order [Doc. #62]. The R&M Parties hereby incorporate by reference and join in the aforementioned Motion for Entry of Protective Order [Doc. #59], the Memorandum in Support of Motion for Entry of Protective Order [Doc. #60], and the Memorandum in Opposition to Plaintiff's Motion for Protective Order [Doc. #62], and all the arguments made and the authorities cited by TUPSS therein.

WHEREFORE, PREMISES CONSIDERED, Defendants Rawlings & MacInnis, P.A., Tammy Vinson, and Jeannie Chisholm respectfully request that this Court grant The UPS Store, Inc.'s Motion for Entry of Protective Order [Doc. #59] and deny Plaintiff's Motion for Protective Order [Doc. #57].

Case No. 3:19-cv-364-CWR-FKB

Arising out of Case No. 3:18-cv-252,  
*Securities and Exchange  
Commission v. Arthur Lamar Adams and  
Madison Timber Properties, LLC*

Hon. Carlton W. Reeves,  
District Judge

Respectfully submitted, this the 2<sup>nd</sup> day of January, 2020.

**RAWLINGS & MACINNIS, P.A., TAMMY  
VINSON AND JEANNIE CHISHOLM**

By: /s/ G. Todd Burwell

OF COUNSEL:

G. Todd Burwell (MSB #8832)

[tburwell@gtbpa.com](mailto:tburwell@gtbpa.com)

Emily K. Lindsay (MSB #104963)

[elindsay@gtbpa.com](mailto:elindsay@gtbpa.com)

G. TODD BURWELL, P.A.

618 Crescent Blvd., Suite 200

Ridgeland, MS 39157

Tel: 601-427-4470

Fax: 601-427-0189

**CERTIFICATE OF SERVICE**

I, G. Todd Burwell, one of the attorneys for Defendants Rawlings & MacInnis, P.A., Tammy Vinson and Jeannie Chisholm, do hereby certify that on this the 2<sup>nd</sup> day of January, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I certify that I have this day forwarded via the ECF system, a true and correct copy of the foregoing to all counsel of record who have registered with that system in this case.

/s/ G. Todd Burwell