

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 TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

Defendants Rawlings & MacInnis, P.A., Tammy Vinson, and Jeannie Chisholm (the "R&M Parties") hereby join in The UPS Store, Inc.'s ("TUPSS") Motion to Dismiss for Lack of Subject Matter Jurisdiction ("Motion to Dismiss") [Doc. #138] and its Memorandum in Support [Doc. #139]. The R&M Parties hereby incorporate by reference and join in the aforementioned Motion to Dismiss [Doc. #138] and Memorandum in Support [Doc. #139], and all the arguments made and the authorities cited by TUPSS therein. The R&M Parties are entitled to a dismissal of all claims against them based on the same arguments and authorities offered by TUPSS in its Motion to Dismiss [Doc. #138] and Memorandum in Support [Doc. #139].

WHEREFORE, PREMISES CONSIDERED, the R&M Parties respectfully request that this Court grant TUPSS's Motion to Dismiss [Doc. #138] and dismiss the Amended Complaint [Dkt. #14] with prejudice.

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 27th day of August, 2020.

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

By: /s/ G. Todd Burwell

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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 27th day of August, 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