

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 ELSER; 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 REPLY  
IN SUPPORT OF ITS MOTION TO DISMISS**

Defendants Rawlings & MacInnis, P.A., Tammy Vinson, and Jeannie Chisholm (the "R&M Parties") hereby join in The UPS Store, Inc.'s ("TUPSS") Reply [Doc. #152] in Support of its Motion to Dismiss for Lack of Subject Matter Jurisdiction [Doc. #138]. The R&M Parties hereby incorporate by reference and join in the aforementioned Reply [Doc. #152] in Support of its Motion to Dismiss for Lack of Subject Matter Jurisdiction [Doc. #138] and Memorandum in Support [Doc. #139], and all the arguments made and the authorities cited by TUPSS therein.

The R&M Parties would show that they 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 for Lack of Subject Matter Jurisdiction [Doc. #138], Memorandum in Support [Doc. #139] and Reply [Doc. #152].

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

WHEREFORE, PREMISES CONSIDERED, the R&M Parties respectfully request that this Court grant TUPSS's Motion to Dismiss for Lack of Subject Matter Jurisdiction [Doc. #138] and dismiss the Amended Complaint [Doc. #14] with prejudice as to all Defendants, including the R&M Parties.

Respectfully submitted, this the 9<sup>th</sup> day of October, 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 9<sup>th</sup> day of October, 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