

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.

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

**DEFENDANTS RAWLINGS AND MACINNIS, P.A.,  
TAMMY VINSON, AND JEANNIE CHISHOLM'S  
JOINDER IN THE UPS STORE, INC.'S  
1292(B) CERTIFICATION REQUEST**

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 Amend Order on Motion to Dismiss for Lack of Standing and 1292(b) Certification Request (“Motion to Amend and 1292(b) Certification Request”) [Doc. #183] concerning TUPSS’s Motion to Dismiss for Lack of Standing (“Motion to Dismiss”) [Doc. #138] and the Court’s Order denying the Motion to Dismiss (“Order”) [Doc. #169]. The R&M Parties hereby incorporate by reference and join in the aforementioned Motion to Amend and 1292(b) Certification Request [Doc. #183], and all the arguments made, the authorities cited and the requests made by TUPSS therein.

WHEREFORE, PREMISES CONSIDERED, the R&M Parties respectfully request that this Court grant TUPSS’s Motion to Amend and 1292(b) Certification Request [Doc. #183]. The R&M

Parties respectfully request that this Court certify its Order [Doc. #138] denying TUPPS' Motion to Dismiss [Doc. #169] for immediate appeal under 28 USC § 1292(b). The R&M Parties further respectfully request any other relief the Court may find just and proper in the premises.

Respectfully submitted, this the 30<sup>th</sup> day of March, 2021.

**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 30<sup>th</sup> day of March, 2021, 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