

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 ELSER;
COURTNEY HERRING; DIANE LOFTON;
CHANDLER WESTOVER; RAWLINGS &
MACINNIS, PA; TAMMY VINSON; and
JEANNIE CHISHOLM,

Defendants.

Case No. 3:19-cv-00364

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

MOTION FOR EXPEDITED CONSIDERATION

Alysson Mills, in her capacity as the court-appointed receiver for Arthur Lamar Adams and Madison Timber Properties, LLC (the “Receiver”), through undersigned counsel, respectfully moves for expedited consideration of her Motion for Protective Order. [Doc. 207].

The Receiver’s Motion for Protective Order seeks relief under Federal Rule of Civil Procedure 26(c) in light of defendant The UPS Store, Inc.’s recent issuing of at least 32 subpoenas to investor-victims. Among other things, the Receiver’s motion seeks to protect from public disclosure investor-victims’ personal identifying information.

Because UPS will likely soon file its subpoena notices and returns in the Court's record and because UPS's subpoenas command investors to produce documents by July 8 at 10:00 a.m., the Receiver requests expedited consideration of her Motion for Protective Order. Although Local Rule 7 provides for responses to motions to be filed within 14 days, an expedited briefing schedule is warranted so that the Court can consider these issues expeditiously.

Counsel is aware that there is a telephonic discovery conference with the Court tomorrow and is happy to discuss at that time any of the issues raised in this motion or the Receiver's Motion for Protective Order, if the Court wishes.

WHEREFORE, for these reasons stated, the Receiver respectfully requests that the Court grant this motion and expedite its consideration of her Motion for Protective Order.

June 22, 2021

Respectfully submitted,

/s/ Lilli Evans Bass

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CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing with the Clerk of Court using the ECF system which sent notification of filing to all counsel of record.

Date: June 22, 2021

/s/ Kristen D. Amond