

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 ELSÉN;
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
OF URGENT AND NECESSITOUS MATTER**

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 an urgent and necessitous matter – the Receiver’s Motion to Quash Subpoenas or, Alternatively, Motion for Protective Order [Doc. 213].

The Receiver’s Motion to Quash Subpoenas or, Alternatively, 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. UPS’s subpoenas request from investor-victims information that is private and irrelevant to the claims and defenses in this case.

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. 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 the issue expeditiously.

To ensure that the Court has time to rule on the Receiver's motion before July 8, the Receiver proposes that UPS's opposition be due on Wednesday, June 30 and the Receiver's reply be due by Friday, July 2. The Receiver, however, would welcome dates that might result in an earlier resolution.

WHEREFORE, for these reasons stated, the Receiver respectfully requests that the Court grant this motion and expedite its consideration of her Motion to Quash Subpoenas or, Alternatively, Motion for Protective Order [Doc. 213].

June 28, 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 28, 2021

/s/ Kristen D. Amond