

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

Civil Action No. 3:19-cv-364-CWR-BWR

PLAINTIFF,

Arising out of Case No.3:18-cv-252,
Securities and Exchange Commission v.
Arthur Lamar and Madison Timber
Properties, LLC

VS.

Hon. Carlton W. Reeves, District Judge

THE UPS STORE, INC.; HERRING
VENTURES, LLC d/b/a THE UPS STORE;
AUSTIN ELSEN; TAMMIE ELSEN; COURTNEY
HERRING; DIANE LOFTON; CHANDLER
WESTOVER; RAWLINGS & MACINNIS, PA;
TAMMY VINSON; and JEANNIE CHISHOLM

DEFENDANTS.

**DEFENDANTS HERRING VENTURES, LLC, AUSTIN ELSEN, TAMMIE ELSEN,
COURTNEY HERRING, DIANE LOFTON, AND CHANDLER WESTOVER'S
RESPONSE TO COURT ORDER [383]**

COMES NOW Defendants, Herring Ventures, LLC, d/b/a The UPS Store, Austin Elsen, Tammie Elsen, Courtney Herring, Diane Lofton, and Chandler Westover ("Defendants"), by and through their attorneys of record, Rushing & Guice, P.L.L.C., and files this Response to Court Order [383] and in support would show unto the court the following to wit:

Defendant Herring Ventures, LLC and its counsel have carefully considered this issue and how to respond to the Court's March 29, 2024 Order without divulging attorney-client communications and/or disclosing attorney work product. After much deliberation, Herring Ventures believes it can state that it is a small business, owned by Dexter Herring and his wife, which has very limited financial resources allowing defense counsel to only operate on a shoestring budget, a fact which has been presented to opposing counsel and to Judge Ball on multiple

occasions, and, that these budget issues directly affected decisions regarding when and/or whether to file actions relating to insurance issues.

Respectfully submitted,

/s/ William Lee Guice III

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CERTIFICATE

I HEREBY CERTIFY that on the 15th day of April, 2024, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the Court's electronic filing system.

/s/ William Lee Guice III

WILLIAM LEE GUICE III