

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,

VS.

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.

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

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

Hon. Carlton W. Reeves, District Judge

**DEFENDANTS HERRING VENTURES, LLC, AUSTIN ELSÉN, TAMMIE ELSÉN,  
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 15<sup>th</sup> 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