

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ALYSSON MILLS, IN HER CAPACITY
AS RECEIVER FOR ARTHUR LAMAR
ADAMS AND MADISON TIMBER
PROPERTIES, LLC,

Plaintiff,

v.

BUTLER SNOW LLP et al.,

Defendants.

Case No. 3:18-cv-00866-CWR-BWR

Hon. Carlton W. Reeves

**BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ PC'S RESPONSE
TO "MOTION FOR PARTIAL SUMMARY JUDGMENT ON SPECIFIC MATTERS
PERTAINING TO DAMAGES"**

Baker, Donelson, Bearman, Caldwell & Berkowitz PC (“Baker Donelson”) submits this Response to the “Motion for Partial Summary Judgment on Specific Matters Pertaining to Damages” submitted by Alysson Mills, in her capacity as Receiver for the estates of Lamar Adams and Madison Timber (“Receiver”), ECF No. 226; ECF No. 227. In support of this Response, Baker Donelson relies on its memorandum of law filed contemporaneously herewith as well as the exhibits identified below and attached hereto:

Ex. 1	Receiver’s Accounting of Alexander Seawright Timber Fund I, LLC (<i>to be filed under seal</i>)
Ex. 2	Expert Report of Steven Rhodes, Esq (July 23, 2025) (<i>to be filed under seal</i>)
Ex. 3	Receiver’s Distributions (Feb. 6, 2025) (<i>to be filed under seal</i>)
Ex. 4	Excerpts from the Deposition of Alysson Mills (May 21, 2025) (<i>to be filed under seal</i>)
Ex. 5	Excerpts from the Deposition of Ken Lefoldt, Jr. (Sept. 22, 2025) (<i>to be filed under seal</i>)

Ex. 6	Excerpts from the Deposition of Investor 167 (Mar. 10, 2025) (<i>to be filed under seal</i>)
Ex. 7	Excerpts from the Deposition of Investor 48.A (Feb. 19, 2025) (<i>to be filed under seal</i>)
Ex. 8	Excerpts from the Deposition of Investor 171 (Mar. 28, 2025) (<i>to be filed under seal</i>)
Ex. 9	Deposition of Donna M. Ingram, Exhibit 11
Ex. 10	Excerpts from the Deposition of Investor 115 (Apr. 10, 2025) (<i>to be filed under seal</i>)
Ex. 11	Excerpts from the Deposition of Investor 121 (May 5, 2025) (<i>to be filed under seal</i>)
Ex. 12	Excerpts from the Deposition of Investor 41 (Apr. 28, 2025) (<i>to be filed under seal</i>)
Ex. 13	Excerpts from the Deposition of Investor 13 (May 14, 2025) (<i>to be filed under seal</i>)

Dated this 17th day of November, 2025

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ PC**

/s/ Craig D. Singer

Craig D. Singer (*pro hac vice*)

Charles Davant (*pro hac vice*)

Benjamin W. Graham (*pro hac vice*)

Hope E. Daily (*pro hac vice*)

William M. Schmidt (*pro hac vice*)

C. Mark Aneke (*pro hac vice*)

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*Counsel for Defendant Baker, Donelson,
Bearman, Caldwell & Berkowitz PC*

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Craig D. Singer

Craig D. Singer

To Be Filed Under Seal

EXHIBIT 1

To Be Filed Under Seal

EXHIBIT 2

To Be Filed Under Seal

EXHIBIT 3

To Be Filed Under Seal

EXHIBIT 4

To Be Filed Under Seal

EXHIBIT 5

To Be Filed Under Seal

EXHIBIT 6

To Be Filed Under Seal

EXHIBIT 7

To Be Filed Under Seal

EXHIBIT 8



Madison Timber
Net Winners from Evidence Analyzed

Exhibit 8
 Amended

Net Winners From Which The Receiver Did Not Pursue Clawbacks of Interest Paid		
Investor Number	Investor	<u>Net Winnings</u>
170		837,738.27
168		763,873.00
83A		682,000.00
129		579,340.44
83C		506,000.00
83B		469,200.00
XXX		371,834.00
88		364,601.80
PP		332,499.80
136		307,408.28
169		307,374.99
141		290,750.00
168B		274,350.00
83		260,083.28
106		248,067.91
PPP		239,416.64
125A		231,120.00
GG		225,000.00
142		223,125.00
64		216,241.91
83D		215,980.00
124		183,999.96
106A		176,200.00
154		159,431.30
40		159,125.00
36		155,989.32
171A		142,550.00
55B		142,000.00
X		142,000.00
178		130,994.64
EEEE		130,484.00
171		130,016.96
66		128,731.96
000		128,435.64
BBB		126,987.92
43		124,445.96
184		123,717.94
OO		116,231.64
103		114,244.00
CCCC		112,480.00
42		112,146.60
QQ		106,999.96
RR		106,000.00
102		105,162.65
DD		104,984.00
10		104,975.97
104		98,124.98
GGG		94,488.00
AAA		94,484.00
UU		90,000.00
108		89,492.00
169A		87,000.00
LLL		82,500.00
G		72,119.36
F		72,000.00
EEE1		71,980.00
92		68,125.00
17		67,887.50

QQQ		65,000.00
106B		64,000.00
81A		60,000.00
DDD		59,999.92
161		59,800.00
119		58,717.94
Q		56,999.48
15B		52,000.00
14		51,872.56
SS		49,195.60
L		48,992.00
15A		48,000.00
I		45,500.00
12		42,379.30
KK		40,492.00
45		39,666.63
DDDD		39,000.00
137		36,148.10
M		35,988.00
168C		34,350.00
LL		33,900.00
FF		31,975.64
58		29,726.48
Z		27,595.96
125		27,383.26
NNN		27,355.80
KKK		27,000.00
XX		27,000.00
AAAA		26,000.00
FFFF		26,000.00
BB		25,310.00
O		24,996.00
II		24,480.00
33		24,099.96
130		24,002.82
HHH		23,999.92
K		23,999.92
S		23,999.92
JJJJ		23,992.00
5		23,354.50
MMM		23,148.00
CCC		21,992.16
21/143		21,950.90
JJJ		20,288.00
WW		19,559.80
H		18,960.04
34		18,833.32
48A		18,000.00
CC		18,000.00
U		18,000.00
W		15,951.92
FFF		15,600.00
EEE		14,996.00
VVV		14,996.00
46		13,850.12
J		13,000.00
TT		13,000.00
VV		13,000.00
Y		13,000.00
TTT		12,000.00
ZZ		12,000.00
MM		11,996.00
T		11,996.00
GGGG		11,991.92

55A		10,000.00
26		9,900.62
HH		9,300.00
LL1		7,492.00
48		7,250.42
63		7,199.96
P		7,184.00
III		6,984.00
A		6,500.00
B		6,500.00
C		6,500.00
E		6,500.00
EE		6,500.00
KKKK		6,500.00
RRR		6,500.00
V		6,360.04
WWW		6,000.00
IIII		5,999.92
YYY		5,999.92
JJ		5,400.00
56		5,366.97
AA		4,000.00
R		3,480.00
HHHH		2,999.96
N		2,999.96
YY		2,999.96
SSS		2,699.88
UUU		2,392.00
WW1		2,392.00
134		2,101.00
168D		1,800.00
D		1,499.92
109		1,000.00
128		412.62
	Total	14,279,640.62

Net Winners From Which The Receiver Pursued Clawbacks of Interest Paid		
ZZZ		299,312.50
	Total	299,312.50
	Overall Total	14,578,953.12

To Be Filed Under Seal

EXHIBIT 10

To Be Filed Under Seal

EXHIBIT 11

To Be Filed Under Seal

EXHIBIT 12

To Be Filed Under Seal

EXHIBIT 13