

**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*)  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue, S.W.  
Washington, DC 20024  
Tel.: (202) 434-5000  
Fax: (202) 434-5029  
Email: csinger@wc.com

James J. Crongeyer, Jr. (MSB #10536)  
James M. Tyrone (MSB #102381)  
WATKINS & EAGER PLLC  
400 East Capitol Street, Suite 300 (39201)  
Post Office Box 650  
Jackson, MS 39205  
Tel.: (601) 965-1900  
Fax: (601) 965-1901  
Email: jcrongeyer@watkinseager.com

*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**

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**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	Net Winnings
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
OOO		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

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