

**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

**REPLY IN SUPPORT OF BAKER DONELSON’S MOTION *IN LIMINE* TO EXCLUDE
PRIOR RULINGS OF THE COURT IN THIS CASE OR IN RELATED CASES**
(Motion *in Limine* No. 5)

The Receiver’s Opposition simply ignores the law holding prior court rulings are inadmissible hearsay. *See, e.g., Homebuilders Ass’n of Mississippi, Inc. v. City of Brandon, Mississippi*, 2009 WL 1788115, at *1 (S.D. Miss. June 19, 2009). And it ignores that admission of prior court rulings run the risk of unduly influencing the jury. *See id.* at *2.

The Receiver argues prior court rulings might provide “context for the jury.” ECF No. 317 (Receiver’s Opp’n to Baker Donelson’s Motion *in Limine*, hereinafter “Opp’n”) at 12 (citing *Starr Indem. & Liab. Ins. Co. v. River & Roads Directional Drilling, LLC*, 2025 WL 1174318, at *2 (S.D. Miss. Apr. 22, 2025)). Her argument does not address the problems of hearsay and prejudice. And the Receiver’s cited authority does not even support her argument: *Starr* did not deal with excluding court rulings; rather, it declined to exclude reference to another lawsuit where the “fact of that suit’s existence” could provide “necessary context” to the case before the jury. 2025 WL 1174318, at *2.

Unable to challenge the substance of Baker Donelson’s motion, the Receiver insists a ruling is unnecessary because she “does not anticipate offering any prior rulings of this Court *as exhibits.*” Opp’n at 12 (emphasis added). This is only further reason for the Court to *grant* the motion. The Receiver cannot even articulate a theory for why any such ruling would be relevant to any issue in this case. In addition, should the Receiver later decide to seek to admit or mention a prior court ruling, she can seek leave to do so (although it is difficult to imagine how a prior ruling could be admissible as evidence in this case).

The Receiver next deflects and argues the request is “too vague” because “Baker Donelson has not identified which rulings in this case it seeks to exclude” nor which “related cases Baker Donelson is referring to.” *Id.* at 12. The motion is not vague. Baker Donelson moves to exclude *all* prior court rulings in the cases arising from the Madison Timber Ponzi scheme.¹ Because the Receiver has not identified any ruling in any case she deems admissible or seeks to admit, this should not be controversial.

CONCLUSION

Baker Donelson respectfully requests the Court enter an order precluding any reference to prior rulings of the Court in this case or in related cases.

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*)

William M. Schmidt (*pro hac vice*)

¹ Cases unrelated to Madison Timber, such as the case concerning Alexander Seawright Transportation LLC, are inadmissible on other grounds. *See* ECF Nos. 305, 306, 318, 319.

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2026, 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