

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

---

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA**

---

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA**

*In re Amie Adelia Vague, et al.*                        )  
                                                                          )  
                                                                          )   **Case No. 2:22-mc-03977-WKW**

**JOINT SUBMISSION OF THE PARTIES**

Pursuant to this Panel’s Order dated June 17, 2022 (Doc. 19), the Parties<sup>1</sup> respectfully suggest the following process for concluding this inquiry:

1. This inquiry should be concluded and dismissed because, based on the applicable legal authorities addressed in the *Walker* counsel’s Pre-Hearing Submission (Doc. 3) and the information gathered by this Panel during the May 20,

---

<sup>1</sup> The Parties are Andrew Daniel Barr, Tara Lynn Borelli, Carl Solomon Charles, Lynly Serena Egyes, James D. Esseks, LaTisha Gotell Faulks, Kathleen Roberta Hartnett, Zoe Wynne Helstrom, Milo Rohr Inglehart, Katelyn Kang, Adam Menke Katz, Dale Melchert, Lisa Nowlin-Sohl, Valeria Marie Pelet Del Toro, Malita Vencienzo Picasso, Elizabeth Fri Reinhardt, Robby L.R. Saldana, Chase Strangio, Sruti J. Swaminathan, Julie Michelle Veroff, and Kaitlin Welborn (the “*Walker* counsel”); Jeffrey P. Doss, Melody H. Eagan, and Amie A. Vague; Gilbert Oladeinbo, Misty L. Peterson, J. Andrew Pratt, Brent P. Ray, Adam Reinke, Michael B. Shortnacy, and Abigail Hoverman Terry; and Asaf Orr, Sarah Warbelow, Cynthia Weaver, Jennifer L. Levi, Scott D. McCoy, Jessica L. Stone, and Diego Armando Soto (the “*Ladinsky* counsel”). As instructed by the Panel, the Parties have cooperatively filed a joint submission. The joint nature of this or any submission to the Panel is without prejudice to the Parties’ position that there were and continue to be two separate and distinct groups or teams of attorneys as regards the material events involved in this inquiry (i.e., *Walker* counsel and *Ladinsky* counsel) (*see* Doc. 3).

2022 proceedings (“May 20 hearing”), counsel did not “attempt to circumvent the random case assignment procedures of the United States District Courts for the Northern District of Alabama and the Middle District of Alabama” (Doc. 1) or otherwise “abuse the judicial process” (Doc. 16). The Parties are prepared to provide additional briefing on this subject if requested by the Panel.

2. If the Panel, based on the information and applicable legal authorities before it, believes that further information is needed to conclude this inquiry, then the Parties respectfully propose the following procedure in the following order:

- a. The Panel dismisses the Parties who fall into the three categories of “non-decision-makers” designated at the May 20 hearing: (1) parties with no knowledge and no input; (2) parties with knowledge and no input; and (3) parties with knowledge and input. This includes parties in these categories who have and have not testified. Any remaining parties are hereinafter referred to as the Remaining Parties. The “non-decision-makers” are:
  - i. Andrew Daniel Barr;
  - ii. Carl Solomon Charles;
  - iii. Zoe Wynne Helstrom;
  - iv. Milo Rohr Inglehart;

- v. Katelyn Kang;
- vi. Adam Menke Katz;
- vii. Dale Melchert;
- viii. Lisa Nowlin-Sohl;
- ix. Valeria Marie Pelet Del Toro;
- x. Malita Vencienzo Picasso;
- xi. Elizabeth Fri Reinhardt;
- xii. Robby L.R. Saldana;
- xiii. Chase Strangio;
- xiv. Sruti J. Swaminathan;
- xv. Julie Michelle Veroff;
- xvi. Kaitlin Welborn;
- xvii. Amie A. Vague;
- xviii. Gilbert Oladeinbo;
- xix. Misty L. Peterson;
- xx. J. Andrew Pratt;
- xxi. Adam Reinke;
- xxii. Abigail Hoverman Terry;
- xxiii. Asaf Orr;
- xxiv. Cynthia Weaver;

xxv. Jessica L. Stone;

xxvi. Diego Armando Soto;

- b. The Panel provides only the Parties with copies of all transcripts of all proceedings that occurred on May 20, 2022 and June 17, 2022, on the condition that the Parties' counsel will not share the transcripts with anyone other than their clients so as to protect the confidentiality of any attorney work product information in the testimony;
- c. The Panel vacates the sequestration order;
- d. The Panel provides the opportunity for one Remaining Party from each law firm and nonprofit legal organization to submit a declaration setting out the facts of what happened and what led to the decisions that were made, with such declarations to be submitted within 21 days after the Parties are provided the transcripts;
- e. Along with the submission of declarations, the Remaining Parties may submit brief(s), either separately or jointly, on the law and relevant facts applicable to the concerns described by the Panel in its Order dated May 10, 2022,

with such briefs to be submitted within 21 days after the Parties are provided the transcripts;

- f. Because it may be necessary to reveal attorney work product in the declarations and briefs, the Remaining Parties be allowed to file those declarations and briefs under seal; and
- g. If the Panel believes it will be helpful for consideration of the issues, counsel for the Remaining Parties have an opportunity to present oral argument.

If at any point during the foregoing process, the Panel believes this inquiry should be concluded and dismissed with no further action taken, the Panel is respectfully requested to do so.

3. The Panel confirmed on June 17, 2022, that this inquiry is not a disciplinary proceeding. The Parties propose that no additional oral testimony is necessary from any of the Parties. Should the Panel determine that further questioning is required, in connection with all further proceedings the Parties should be provided full due process rights.

Respectfully submitted, this the 24<sup>th</sup> day of June, 2022,

*s/ Jennifer H. Wheeler*

---

Bruce F. Rogers  
Jennifer Hanson Wheeler  
BAINBRIDGE, MIMS, ROGERS & SMITH, LLP  
The Luckie Building  
600 Luckie Drive, Suite 415  
Birmingham, Alabama 35223  
Telephone: (205) 879-1100  
Facsimile: (205) 879-4300  
Email: brogers@bainbridgemims.com  
jwheeler@bainbridgemims.com

*Counsel for Gilbert Oladeinbo, Misty L.  
Peterson, J. Andrew Pratt, Brent P. Ray,  
Adam Reinke, Michael B. Shortnacy, and  
Abigail Hoverman Terry*

*s/ Samuel H. Franklin*

---

Samuel Holley Franklin  
Mark Christian King  
LIGHTFOOT FRANKLIN & WHITE LLC  
400 20<sup>th</sup> Street North; The Clark Building  
Birmingham, AL 35203  
Telephone: (205) 581-0700  
Facsimile: (205) 581-0799  
Email: sfranklin@lightfootlaw.com  
cking@lightfootlaw.com

*Counsel for Jeffrey P. Doss, Melody H.  
Eagan, and Amie A. Vague*

*s/ Robert D. Segall*

---

Robert D. Segall  
COPELAND, FRANCO, SCREWS & GILL, P.A.  
444 South Perry Street  
Post Office Box 347  
Montgomery, Alabama 36101-0347  
Phone: (334) 834-1180  
Fax: (334) 834-3172  
Email: segall@copelandfranco.com

*Counsel for Asaf Orr, Sarah Warbelow,  
Cynthia Weaver, Jennifer L. Levi, Scott D.  
McCoy, Jessica L. Stone, and Diego  
Armando Soto*

*s/ Barry A. Ragsdale*

---

Barry Alan Ragsdale

Robert Smith Vance, III

DOMINICK FELD HYDE, P.C.

1130 22nd Street South, Suite 4000

Birmingham, Alabama 35205

Phone: (205) 536-8888

Email: bragsdale@dfhlaw.com

rvance@dfhlaw.com

*Counsel for Andrew Daniel Barr, Tara Lynn  
Borelli, Carl Solomon Charles, Lynly Serena  
Egyes, James D. Esseks, LaTisha Gotell  
Faulks, Kathleen Roberta Hartnett, Zoe  
Wynne Helstrom, Milo Rohr Inglehart,  
Katelyn Kang, Adam Menke Katz, Dale  
Melchert, Lisa Nowlin-Sohl, Valeria Marie  
Pelet Del Toro, Malita Vencienzo Picasso,  
Elizabeth Fri Reinhardt, Robby L.R. Saldana,  
Chase Strangio, Sruti J. Swaminathan, Julie  
Michelle Veroff, and Kaitlin Welborn*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2022, I filed the foregoing documents with the Clerk of Court via CM/ECF which will serve all counsel of record by electronic mail.

*s/ Jennifer H. Wheeler*

\_\_\_\_\_  
Of Counsel