

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

SHAWN COREY CARTER,

Carter,

V.

**ANTHONY BUZBEE, DAVID
FORTNEY, ANTHONY G. BUZBEE LP
(d/b/a THE BUZBEE LAW FIRM), et al.,**

Defendants.

$\S \S$

1:25-cv-00086-TFM-MU

**DEFENDANTS ANTHONY BUZBEE’S, DAVID FORTNEY’S,
and ANTHONY G. BUZBEE LP’S BRIEF IN SUPPORT OF MOTIONS
FOR DEFENDANT JANE DOE TO PROCEED USING PSEUDONYM**

Defendants Anthony Buzbee, David Fortney, and Anthony G. Buzbee LP (collectively, the “Buzbee Defendants”) urge the Court to grant the motions seeking the Court’s permission to allow Defendant Jane Doe (“Doe”) to proceed in this matter using that pseudonym without publicly revealing her real name.

The Buzbee Defendants hereby adopt and incorporate by reference the arguments made by Doe (Doc. 80) and the Curis Defendants (Doc. 79).

Further, the Buzbee Defendants note that all parties to this litigation are in agreement that Doe's identity should remain private and that her privacy rights in these special circumstances significantly outweigh and overcome the presumption of openness in judicial proceedings.

WHEREFORE, the Buzbee Defendants respectfully request that the Court grant the pending motions to keep Doe’s identity private and to allow her to proceed in this case using the “Jane Doe” pseudonym.

Respectfully submitted,

/s/ **Matthew R. Jackson**

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CERTIFICATE OF SERVICE

I hereby certify that on September 5th, 2025, I served a copy of the foregoing upon all counsel of record via this Court's CM/ECF System.

/s/ **Matthew R. Jackson**

OF COUNSEL