

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

ALLIANCE LAUNDRY SYSTEMS LLC,

Plaintiff,

v.

TRUDY ADAMS, et al.,

Defendants

TRUDY ADAMS, JOHN "CLAY"
WILLIAMS,

Defendant/Counterclaim
Plaintiffs,

v.

ALLIANCE LAUNDRY SYSTEMS LLC,
GREG REESE, MIKE HAND and
SAMANTHA BAKER,

Plaintiff/Counterclaim
Defendants and Third-Party
Defendants

Case No.: 23-cv-22130-MCR-ZCB

**DECLARATION OF MELINDA S. GIFTOS IN SUPPORT OF
ALLIANCE'S RESPONSE TO DEFENDANTS' MOTION TO STRIKE THE
EXPERT DECLARATION OF MARK LANTERMAN AND EXCLUDE
LANTERMAN'S TESTIMONY**

I, Melinda S. Giftos, being first duly sworn and under oath, depose and

state as follows:

1. I am an attorney at Husch Blackwell LLP. I represent Alliance Laundry Systems LLC (“**Plaintiff**”) in this lawsuit. I make this Declaration based on personal knowledge and in support of Alliance’s Response to Defendants’ Motion to Strike Expert Declaration of Mark Lanterman and Exclude Lanterman’s Testimony.

2. Attached as **Exhibit 1** are relevant excerpts of the transcribed videotaped sworn deposition of Mark Tracey Lanterman, taken on February 11, 2025.

3. On March 25, 2025, I called the Hennepin County Attorney’s Office to identify myself as counsel in the Florida case being cited in media that led to the office’s investigation of Mr. Lanterman. I did not receive an answer, so I left a message.

4. On March 25, 2025, I called the Minneapolis field office for the United States Secret Service to confirm whether Mr. Lanterman was a member of the U.S. Secret Serves Electronic Crimes Task Force in approximately 1995-2003. He said he’d send it to duty officer and would get back to me as soon as possible. The Special Agent in charge of the office, Matt Cyber, called me back and confirmed that: (a) Mark Lanterman was a sworn investigator for the United States Secret Service Electronic Crimes Task Force while he was

employed by Hopkins Police Department; and (b) that all members of the United States Secret Service Electronic Crimes Task Force are sworn in as U.S. Marshals.

5. On March 25, 2025, I submitted a FOIA request with the United States Department of Justice United Marshals Service to seek verification that Mr. Lanterman was sworn as a U.S. Marshal as part of his participation in the United States Secret Service Electronic Crimes Task Force via its online tool. According to their website, responses will take 11 working days for simple requests and 93 working days for complex requests. I have not yet received a response to my request, but expect to.

Department of Justice >

United States Marshals Service

Agency mission

United States Marshals serve as law enforcement agents of the government and, in that capacity, also serve as officers of the federal courts. The United States Marshals Service maintains files on individuals for whom federal warrants have been issued, records on prisoners in the custody of the United States Marshals, background information and records related to threats to and the protection of government witnesses, U.S. Attorneys and their assistants, federal jurists, and other court officials, records on process served and executed in federal court proceedings, and records on seized and forfeited property and evidence. It also maintains various records pertaining to the administration of the Service, including official personnel files for its employees.

[FOIA Reference Guide](#)

[FOIA Regulations](#)

Average processing time for 2024



11 working days for simple requests

93 working days for complex requests

The records or information you're looking for may already be public.



Visit the agency's [website](#) to learn more.

To see what's been made available, you can visit an agency's [FOIA library](#).

[Continue the FOIA request process](#)

6. Attached as **Exhibit 2** is Defendant's Objections and Responses to Alliance Laundry Systems LLC's Second Set of Requests for Production to John "Clay" Williams at ¶46 served to Alliance June 24, 2024.

7. Attached as **Exhibit 3** is - Defendant's Amended Responses and Objections to Alliance Laundry Systems LLC's Second Set of Requests for Production to John "Clay" Williams at ¶46 served to Alliance on October 8, 2024.

8. Alliance produced forensic images to Defendants including Bates Stamp No. ALSD000003458 December 6, 2024.

9. Attached as **Exhibit 5** is an email, a true and correct copy of Plaintiff's production bearing Bates Stamp No. ALSD000016134 .

10. Attached as **Exhibit 6** is a true and correct copy of Plaintiff's production bearing Bates Stamp No. ALSD000016131 and Defendants' production bearing Bates Stamp Nos. JOINTD0019292- JOINTD0019293.

11. Attached as **Exhibit 7** is Defendant's Objections and Responses to Alliance Laundry Systems LLC's Second Set of Requests for Production Trudy at ¶54 served to Alliance June 24, 2024.

12. Attached as **Exhibit 8** is - Defendant's Amended Responses and Objections to Alliance Laundry Systems LLC's Second Set of Requests for Production to Trudy Adams at ¶54 served to Alliance on October 8, 2024.

13. Attached as **Exhibit 9** is Defendant's Objections and Responses to Alliance Laundry Systems LLC's Second Set of Requests for Production Trudy at ¶55 served to Alliance June 24, 2024.

14. Attached as **Exhibit 10** is Defendant's Amended Responses and Objections to Alliance Laundry Systems LLC's Second Set of Requests for Production to Trudy Adams at ¶55 served to Alliance on October 8, 2024.

15. Attached as **Exhibit 11** is Defendant Trudy Adams', Responses and Objections to Plaintiff's Second Set for Production at ¶75 served to Alliance January 31, 2025.

16. Attached as **Exhibit 12** is an email and attachment, a true and correct copy of Defendants' production bearing Bates Stamp Nos. TA000290-TA000291.

17. Attached as **Exhibit 13** is an email and attachment, a true and correct copy of Defendants' production bearing Bates Stamp Nos. JOINTD0017419- JOINTD0017420.

18. Attached as **Exhibit 14** are relevant excerpts of the transcribed videotaped sworn deposition of John "Clay" Williams, taken on January 20, 2025.

26. The University of St. Thomas School of Law identifies Mr. Lanterman as faculty on its publicly facing website at <https://law.stthomas.edu/about/faculty-staff/directory/mark-lanterman/>. A true and correct copy of a printout of that website is attached as **EXHIBIT 21**.

27. The National Judicial College in Reno, NV lists Mr. Lanterman as faculty for “Advanced Skills for Appellate Judges,” which was held between November 11 and November 14, 2025 on its publicly facing website at <https://www.judges.org/courses/advanced-skills-for-appellate-judges/>. A true and correct copy of a printout of that website is attached as **EXHIBIT 22**.

28. The Sedona Conference website lists Mr. Lanterman as its faculty on its publicly facing website at [https://thesedonaconference.org/AI and the law part 1](https://thesedonaconference.org/AI_and_the_law_part_1). A true and correct copy of a printout of that website is attached as **EXHIBIT 23**.

29. Attached as **Exhibit 24** is a true and correct copy of November 2022 report published by the National Institute of Standards and Technology (NIST) entitled “Digital Investigation Techniques: A NIST Scientific Foundation Review.”

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated March 28, 2025.

s/Melinda S. Giftos

Melinda S. Giftos

Florida Bar No. 0302960

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