

Gregory J. Marshall (#019886)
Amanda Z. Weaver (#034644)
Bradley R. Pollock (#033353)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, Arizona 85004-2202
Telephone: 602.382.6000
gmarshall@swlaw.com
aweaver@swlaw.com
bpollock@swlaw.com
*Attorneys for Defendants U.S. Bank National
Association and Hilda H. Chavez*

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

PETER S. DAVIS, as Receiver of
DENSCO INVESTMENT
CORPORATION, an Arizona corporation,

Plaintiff,

v.

U.S. BANK, NA, a national banking
organization; HILDA H. CHAVEZ and
JOHN DOE CHAVEZ, a married couple;
JP MORGAN CHASE BANK, N.A., a
national banking organization;
SAMANTHA NELSON f/k/a
SAMANTHA KUMBALECK and
KRISTOFER NELSON, a married couple;
and VIKRAM DADLANI and JANE DOE
DADLANI, a married couple.

Defendants.

No. CV2019-011499

**THE U.S. BANK DEFENDANTS'
FIRST SUPPLEMENTAL
RESPONSES TO DENSCO
INVESTMENT CORPORATION
SECOND SET OF REQUESTS FOR
PRODUCTION**

(Assigned to the Hon. Daniel Martin)

Defendant U.S. Bank National Association ("U.S. Bank") submits this First Supplemental Response to Densco Investment Corporation Second Set of Requests for Production.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 5:

Organizational charts for any department of the Bank responsible for compliance, fraud detection, money laundering detection, or any other function directed to uncovering crime or fraud during the relevant time period of the Third Amended Complaint.

RESPONSE:

U.S. Bank objects on the following grounds: (1) the request seeks documents that are not relevant to any claim or defense in this case; (2) the terms “compliance” department, “fraud detection” department, “money laundering detection” department, and “any other function directed to uncovering crime or fraud” are so vague and ambiguous that U.S. Bank cannot reasonably discern their meanings; (3) the request is overbroad because it purports to seek information about U.S. Bank departments, products, and services that are unrelated to any claim or defense in this case as to U.S. Bank; (4) the request is overbroad because it seeks documents from time periods that are not relevant to any claim or defense as to U.S. Bank, and (5) the request is disproportionate to the needs of the case. **Notwithstanding these objections, U.S. Bank states that, following a reasonable search, it was unable to locate any organizational charts for the time period January through April 2014 for U.S. Bank’s Risk Compliance and Audit (RCA) Anti-Money Laundering group.**

REQUEST FOR PRODUCTION NO. 17

Any policies and procedures pertaining or related to oversight of private bankers and branch personnel. In addition, provide, without limitation, any and all annual or periodic employment reviews for the period covering calendar years 2011 through 2017 of Susan Lazar (who was the private banker for Scott Managed at JP Morgan Chase Bank), Samantha Nelson (f/k/a Samantha Kumbalek) and Vikram Dadlani (both of JP Morgan Chase Bank), and Hilda H. Chavez (U.S. Bank). Include compensation histories which identify base salary and bonus compensation separately, and any performance recognition awards and/or disciplinary actions related to each of the named employees.

RESPONSE:

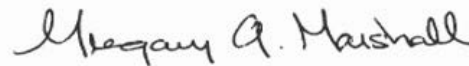
U.S. Bank objects on the following grounds: (1) the request seeks documents that are not relevant to any claim or defense in this case; (2) the request is overbroad as to scope and time and therefore seeks documents that are not relevant to any claim or defense as to U.S. Bank; (3) the request seeks a production that is disproportionate to the needs of the case; (4) the phrase “oversight” of “private bankers and branch personnel” is so vague and

1 ambiguous that U.S. Bank cannot reasonably discern what is requested; and (5) to the
2 extent the request includes employees other than U.S. Bank employees, U.S. Bank is not
3 in the possession, custody, or control of any responsive documents. **Notwithstanding**
4 **these objections, and following a reasonable inquiry, U.S. Bank identifies the**
5 **following documents: Hilda Chavez performance reviews that applied for the time**
6 **period January through April 2014 (USB_DENSCO001153-1169 (Highly**
7 **Confidential – Subject to Protective Order)) and compensation and bonus**
8 **information for Hilda Chavez that applied for the time period January through April**
9 **2014 (USB_DENSCO001170-1172 (Highly Confidential – Subject to Protective**
10 **Order)).**

11 DATED this 20th day of August, 2021.

12 SNELL & WILMER L.L.P.

13
14 By:



15 Gregory J. Marshall
16 Amanda Z. Weaver
17 Bradley R. Pollock
18 One Arizona Center
19 400 E. Van Buren, Suite 1900
20 Phoenix, Arizona 85004-2202
21 *Attorneys for Defendants U.S. Bank*
22 *National Association and Hilda H.*
23 *Chavez*
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CERTIFICATE OF SERVICE

The foregoing was served via e-mail on the following parties this 20th day of August, 2021.

Colin F. Campbell, Esq.
Geoffrey M. T. Sturr, Esq.
Timothy J. Eckstein, Esq.
Joseph N. Roth, Esq.
Osborn Maledon, P.A.
2929 N. Central Avenue, Suite 2100
Phoenix, Arizona 85012
ccampbell@omlaw.com
gsturr@omlaw.com
teckstein@omlaw.com
jroth@omlaw.com
Attorneys for Plaintiff

Nicole Goodwin, Esq.
Jonathan H. Claydon, Esq.
Greenberg Traurig
2375 E. Camelback Road #700
Phoenix, Arizona 85016
goodwinn@gtlaw.com
claydonj@gtlaw.com
*Attorneys for Defendants JP Morgan Chase
Bank, Samantha Nelson, Kristofer Nelson,
Vikram Dadlani, and Jane Doe Dadlani*

/s/ Ranie Rozenberg