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8
9 **SUPERIOR COURT OF ARIZONA**
10 **COUNTY OF MARICOPA**

11 Peter S. Davis, as Receiver of DenSco
Investment Corporation, an Arizona
12 corporation,

13 Plaintiff,

14 v.

15 Clark Hill PLC, a Michigan limited liability
company; David G. Beauchamp and Jane
16 Doe Beauchamp, husband and wife,

17 Defendants.

No. CV2017-013832

**DEFENDANTS' SEVENTH
SUPPLEMENTAL DISCLOSURE
STATEMENT: LAY WITNESS
DISCLOSURE**

(Commercial Case)

(Assigned to the Honorable Daniel Martin)

18 Pursuant to the Court's May 16, 2018 Scheduling Order, Defendants Clark Hill PLC
19 and David G. Beauchamp, hereby disclose the following lay witnesses:

20 **A. Clark Hill Parties**

- 21 1. David Beauchamp, Clark Hill
22 2. Daniel Schenk, Clark Hill
23 3. Robert Anderson, Clark Hill
24 4. Edward Hood, Clark Hill
25 5. Michelle Tran, Clark Hill
26

B. Receiver Parties

6. Peter Davis

7. Ryan Anderson

C. Menaged and related persons

8. Yomtov "Scott" Menaged

9. Jeff Goulder, Stinson Morrison Hecker

10. Cody Jess, Schian Walker

11. Veronica Castro aka Veronica Gutierrez Reyes

12. Luigi Amoroso

13. Alberto Pena

14. Troy Flippo

15. Joseph Menaged

16. Michelle Menaged

17. Jennifer Bonfiglio

18. Joy Menaged

19. Jess Menaged

20. John Ray

D. Chittick/DenSco and related parties

21. Shawna Heuer

22. David Preston

23. Eldon Chittick

24. Carleen Chittick

25. Sharla Chittick

26. Ranasha Chittick

27. Jim Polese, Gammage & Burnham, as counsel for the Chittick estate

1 28. Kevin Merritt, Gammage & Burnham as counsel for the Chittick estate and as
2 prior counsel for DenSco.

3 **E. Chase Bank**

4 29. Person Most Knowledgeable / 30(b)(6) Witness

5 30. Samantha Kumbalek (Chase)

6 31. Vikram Dadlani (Chase)

7 32. Susan Lazar (Chase)

8 **F. US Bank**

9 33. Person Most Knowledgeable / 30(b)(6) Witness

10 34. Potential US Bank employees as may be discovered through subsequent
11 depositions and written discovery.

12 **G. Reichman/Active Funding Group related parties**

13 35. Gregg Seth Reichman

14 **H. DenSco Investors**

15 36. Each and any of the DenSco investors are lay witnesses in these proceedings.
16 Defendants are not listing each such investor in this disclosure, but reserve the
17 right to call any DenSco investor as a fact witness in this proceeding. Those
18 investors include, but are not limited to :

19 a. Steve Bunger

20 b. Anthony Burdett

21 c. Warren Bush

22 d. Doriann Davis

23 e. Russ Dupper

24 f. Brian Imdieke

25 g. Paul Kent

26 h. Robert Koehler

- 1 i. Barry Luchtel
2 j. Patricia Miller
3 k. Judy Siegford
4 l. Mark Sifferman
5 m. William Swirtz
6 n. Steve Tuttle
7 o. Scott Gould
8 p. G.E. Siegford
9 q. Ralph Hey
10 r. Coralee Thompson
11 s. Kevin Potempa
12 t. Tony Smith
13 u. Scott Gould
14 v. Dale Hickman

15 **I. DenSco Borrowers**

- 16 37. Victor Gojcaj
17 38. Christopher Hughes

18 **J. Arizona Corporation Commission**

- 19 39. Wendy Coy
20 40. Gary Clapp

21 **K. DenSco/Menaged Title and Escrow Companies**

- 22 41. Debbie Pihl (MagnuS Title)
23 42. Ellen Bolduc (Suburban Mort)

24 **L. Other**

- 25 43. All witness identified or deposed by Plaintiff.
26 44. All witnesses deposed by Defendants.

1 45. All witnesses identified in documents produced by Plaintiff.

2 46. Custodians of records as necessary, including, but not limited to:

- 3 a. Michael Boland, c/o Coppersmith Brockelman, regarding the collection,
4 preservation and production of data and documents from Clark Hill.
- 5 b. Andrea Padinha, c/o Coppersmith Brockelman, regarding the collection,
6 preservation and production of data and documents from Clark Hill.
- 7 c. TERIS, regarding the collection, preservation and production of data and
8 documents from the Chittick estate.
- 9 d. D4 Technology & eDiscovery, regarding the collection, preservation
10 and production of data and documents from the Chittick estate.
- 11 e. Gammage & Burnham regarding the collection, preservation and
12 production of data and documents from the Chittick estate.
- 13 f. Ryan Anderson, regarding the collection, preservation and production of
14 data and documents produced by Yomtov Menaged to the Receiver.
- 15 g. Forensics Consulting Solutions, LLC, regarding the collection,
16 preservation and production of data and documents produced by
17 Yomtov Menaged's.
- 18 h. U.S. Bank
- 19 i. Chase Bank
- 20 j. The Receiver, regarding the collection, preservation and production of
21 data and documents residing in the Depository.

1 DATED this 28th day of June, 2019.

2 Coppersmith Brockelman PLC

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4 By: 

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9 ORIGINAL of the foregoing e-mailed/mailed this
28th day of June, 2019 to:

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