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*Attorneys for Defendants U.S. Bank National
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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'
SIXTH SUPPLEMENTAL
DISCLOSURE STATEMENT**

(Assigned to the Hon. Daniel Martin)

Defendants U.S. Bank National Association and Hilda H. Chavez (collectively, the
“U.S. Bank Defendants”) provide this Sixth Supplemental Disclosure Statement in
accordance with Ariz. R. Civ. P. 26.1.

1 **I. WITNESSES EXPECTED TO BE CALLED AT TRIAL**

2 The U.S. Bank Defendants have not yet identified the witnesses they expect to call
3 at trial, but reserve the right to call the person identified in Section II, below.

4 **II. PERSONS WHO MAY HAVE RELEVANT KNOWLEDGE OR**
5 **INFORMATION**

6 Without conceding relevancy or admissibility, U.S. Bank identifies the following
7 person who may have knowledge or information relevant to the subject matter of the
8 action.

9 1. Veronica Castro, [REDACTED]
10 [REDACTED] (Confidential – Subject to Protective Order). Castro is expected to have
11 knowledge regarding her work for Menaged, Easy Investments, and Arizona Home
12 Foreclosures, as well as her interactions with and representations to employees at U.S.
13 Bank.

14 **III. TANGIBLE EVIDENCE, DOCUMENTS, OR ELECTRONICALLY**
15 **STORED INFORMATION THAT MAY BE RELEVANT**

16 Without conceding their relevancy or admissibility, U.S. Bank identifies the
17 following documents:

18 1. Email correspondence with Ken Frakes regarding subpoena for
19 correspondence with CorrLinks (USB_DENSCO001302-05).

20 2. USB_DENSCO001108-09 and USB_DENSCO001132-34 (Highly
21 Confidential – Subject to Protective Order) as unredacted per Court order, in its Minute
22 Entry dated May 4, 2022.

23 **IV. EXPERT WITNESSES**

24 1. Keith L. Hendricks, 1850 N. Central Ave., Suite 1100, Phoenix, AZ 85004.
25 Mr. Hendricks will opine regarding the standard of care related to David Beauchamp and
26 Clark Hill's legal representation of DenSco, as summarized in his report (Highly
27 Confidential – Subject to Protective Order). The U.S. Bank Defendants anticipate that if
28 deposed or called as a trial witness, Mr. Hendricks will testify consistent with his report.

2. Mark R. Lee, 5998 Alcala Park, Warren Hall 135, San Diego, CA 92110. Mr. Lee will opine regarding DenSco's breaches of various securities laws and David Beauchamp and Clark Hill's failures to properly advise DenSco, as summarized in his report. The U.S. Bank Defendants anticipate that if deposed or called as a trial witness, Mr. Lee will testify consistent with his report.

3. Jack W. Hilton, 11024 N. 28th Dr. #170, Phoenix, AZ 85029. Mr. Hilton will opine concerning the standards and practices in the private lending industry as to DenSco, as summarized in his report. The U.S. Bank Defendants anticipate that if deposed or called as a trial witness, Mr. Hilton will testify consistent with his report.

DATED this 20th day of May 2022.

SNELL & WILMER L.L.P.

By: 

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CERTIFICATE OF SERVICE

The foregoing was served via e-mail on the following parties this 20th day of May 2022.

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/s/ 

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