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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'
NINTH SUPPLEMENTAL
DISCLOSURE STATEMENT**

(Assigned to the Hon. Dewain D. Fox)

Defendant U.S. Bank National Association provides this Ninth 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 reserves 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. Karen Ricker (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One
10 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona, 85004-2202). U.S.
11 Bank previously identified as trial witnesses one or more representatives of the bank who,
12 while not expected to have any personal knowledge of the allegations in Plaintiff's
13 complaint, are expected to testify and lay foundation for U.S. Bank records, policies,
14 procedures, and training disclosed in this case, including documents thereafter disclosed.
15 U.S. Bank identifies as one such representative Ms. Ricker, who has knowledge and may
16 testify regarding branch procedures and practices for issuing cashier's checks to
17 customers in 2013 and 2014, including the OPS Manual procedures, how cashier's checks
18 were issued, signature and signature authority, accepting unused cashier's checks for
19 deposit, voiding / reversing cashier check transactions, and the documentation generated
20 as a result of cashier check transactions. Ms. Ricker has knowledge and may also testify
21 about other procedures and practices observed by the branch regarding the Easy
22 Investments, LLC account and transactions as reflected in the U.S. Bank documents that
23 have been disclosed in this case, including hold periods associated with unused cashier
24 checks and cash withdrawals.

25 **III. TANGIBLE EVIDENCE, DOCUMENTS, OR ELECTRONICALLY**
26 **STORED INFORMATION THAT MAY BE RELEVANT**

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

1. Unredacted Post-Ruling AML log (USB_DENSCO001316 - USB_DENSCO001318, Highly Confidential – Subject to Protective Order).
2. 2013 and 2014 Retention Schedules (USB_DENSCO001319 – USB_DENSCO001324, Highly Confidential – Subject to Protective Order).
3. Replacement documents relating to the opening of the Easy Investments account ending 4457 (USB_DENSCO001325 – USB_DENSCO001330 Confidential – Subject to Protective Order).

DATED this 19th day of October 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 19th day of
October 2022.

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