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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.

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

Defendants.

No. CV2017-013832

**PLAINTIFF'S DISCLOSURE OF
AREAS OF EXPERT TESTIMONY**

Pursuant to the scheduling order entered in this matter, Plaintiff Peter S. Davis, as the court-appointed receiver of DenSco Investment Corporation (the "Receiver"), discloses the following areas of expert testimony he anticipates offering at trial:

1. The applicable standard of care, Defendants' departure from the standard of care and how that departure caused injury to DenSco. Departure from the standard of care will encompass all allegations in the Complaint, both legal malpractice and breaches of fiduciary duty, and will be premised on all actions described in Plaintiff's Rule 26.1 statement of facts. Expert testimony may also address whether the departures from the standard of care are gross departures from the standard of care.

2. The damages suffered by DenSco as a result of Defendants' conduct, including compensatory damages, consequential damages, punitive damages and prejudgment interest.

3. To rebut expert testimony offered by Defendants on standard of care, damages, and any other topic disclosed by Defendants.

DATED this 7th day of September, 2018.

OSBORN MALEDON, P.A.

By

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COPY of the foregoing mailed
this 7th day of September, 2018, on:

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