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*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'  
FIFTH 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 Fifth Supplemental Disclosure Statement in  
accordance with Ariz. R. Civ. P. 26.1.

**III. WITNESSES EXPECTED TO BE CALLED AT TRIAL**

The U.S. Bank Defendants have not yet identified the witnesses it expects to call at  
trial, but reserves the right to call the persons identified in Section IV, below.

1 **IV. PERSONS WHO MAY HAVE RELEVANT KNOWLEDGE OR**  
2 **INFORMATION**

3 Without conceding relevancy or admissibility, U.S. Bank identifies the following  
4 persons who may have knowledge or information relevant to the subject matter of the  
5 action.

6 1. Hilda Chavez (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One  
7 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.  
8 Chavez currently is the Branch Manager of the U.S. Bank Arrowhead location (6545) and  
9 is believed to have used teller box 0003 during the relevant January and April 2014 time  
10 period, during which time she was a Branch Assistant. Upon information and belief, Ms.  
11 Chavez is expected to have knowledge regarding her interactions with Menaged and  
12 Castro during their visits to the U.S. Bank branch location, their purchase and deposit of  
13 cashier's checks, her understanding of Menaged's business, and U.S. Bank's policies and  
14 banking practices as pertaining to the Easy Investment account and the transactions at  
15 issue in the Third Amended Complaint.

16 2. Leslie Nicole Rocha (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,  
17 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.  
18 Rocha was the Brach Manager of the U.S. Bank Arrowhead location (6545) during the  
19 relevant January to April 2014 time period, and Ms. Rocha is believed to have used teller  
20 box 0001. Upon information and belief, Ms. Rocha is expected to have knowledge  
21 regarding her interactions with Menaged and Castro during their visits to the U.S. Bank  
22 branch location, their purchase and deposit of cashier's checks, her understanding of  
23 Menaged's business, and U.S. Bank's policies and banking practices as pertains to the  
24 Easy Investment account and the transactions at issue in the Third Amended Complaint.

25 3. Julia Wanta (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One  
26 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.  
27 Wanta was a private banker during the relevant January to April 2014 time period. Upon  
28 information and belief, while Ms. Wanta is referenced in the Third Amended Complaint,

1 Ms. Wanta does not have any recollection of any dealings with Menaged or Castro, or the  
2 U.S. Bank transactions at issue in the Third Amended Complaint.

3 4. Tatjana Sulaver (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One  
4 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.  
5 Sulaver is a former employee of U.S. Bank who worked at the U.S. Bank Arrowhead Frys  
6 location (6545) until on or about February 1, 2014. Ms. Sulaver is believed to have used  
7 teller box 0002. Upon information and belief, Ms. Sulaver is expected to testify that she  
8 has no recollection of any dealings with Menaged or Castro, or the U.S. Bank transactions  
9 at issue in the Third Amended Complaint.

10 5. Daniella Caraveo (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,  
11 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.  
12 Caraveo is a former employee of U.S. Bank who worked at the U.S. Bank Arrowhead  
13 Frys location (6545) during the relevant time period of January 2014 to March 16, 2014.  
14 Ms. Caraveo is believed to have used teller box 0004. Upon information and belief, Ms.  
15 Caraveo's knowledge of any dealings with Menaged or Castro, or the U.S. Bank  
16 transactions at issue in the Third Amended Complaint, are not known.

17 6. Maria Magdalena Villa (c/o Gregory J. Marshall, SNELL & WILMER  
18 L.L.P., One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-  
19 2202). Ms. Villa is a former employee of U.S. Bank who worked at the U.S. Bank  
20 Arrowhead Frys location (6545) during the relevant February 17, 2014 to April 2014. Ms.  
21 Villa is believed to have used teller box 0002. Upon information and belief, Ms. Villa  
22 may have some limited memory of Castro's cashier's check transactions.

23 7. Jesse Dwayne Head (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,  
24 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Mr.  
25 Head is a former employee of U.S. Bank who worked at the U.S. Bank Thunderbird  
26 location (5109) during the relevant January to April 2014 time period. Mr. Head is  
27 believed to have used teller box 0005. Upon information and belief, Mr. Head's  
28

1 knowledge of information relevant to the claims and defenses in this litigation is  
2 unknown.

3 8. Lorraine Star Parra (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,  
4 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.  
5 Parra is a former employee of U.S. Bank who worked at the U.S. Bank Thunderbird  
6 location (5109) during the relevant January to April 2014 time period. Ms. Parra is  
7 believed to have used teller box 0006. Upon information and belief, Ms. Parra is not  
8 expected to have any recollection of any dealings with Menaged or Castro, or the U.S.  
9 Bank transactions at issue in the Third Amended Complaint.

10 DATED this 20th day of August, 2021.

11 SNELL & WILMER L.L.P.

12  
13 By:



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21 *National Association and Hilda H.*  
22 *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.

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Geoffrey M. T. Sturr, Esq.  
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