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*Attorneys for Defendants JPMorgan Chase Bank, N.A.,
Samantha Nelson f/k/a Samantha Kumbaleck,
Kristofer Nelson, Vikram Dadlani, and Jane Doe Dadlani*

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

**DEFENDANTS JPMORGAN
CHASE BANK, N.A., SAMANTHA
NELSON F/KA/ SAMANTHA
KUMBALECK, KRISTOFER
NELSON, VIKRAM DADLANI, &
JANE DOE DADLANI'S
DISCLOSURE OF AREAS OF
EXPERT TESTIMONY**

(Assigned to the Hon. Daniel Martin)

1 In accordance with the scheduling order in this matter, Defendants JPMorgan
2 Chase Bank, N.A., Samantha Nelson, Kristofer Nelson, Vikram Dadlani, and Jane Doe
3 Dadlani (collectively, the “Chase Defendants”) hereby disclose the following areas as to
4 which they may present expert testimony, either in their case in chief or in rebuttal to lay
5 or expert testimony presented by Plaintiff. The Chase Defendants fully reserve their right
6 to modify, amend and/or supplement these designations as necessary and appropriate as
7 the case develops.

8 1. The damages, or lack thereof, suffered by DenSco Corporation (“DenSco”)
9 and/or its alleged investors relating to the alleged misconduct of Yomtov Menaged,
10 including without limitation, the lack of a causal relationship between the claimed
11 damages and the conduct of the Chase Defendants and intervening/superseding causes of
12 the alleged damages.

13 2. All aspects of the hard money lending industry, including, without
14 limitation, industry standards for the hard money lending industry in the greater Phoenix
15 region in the applicable timeframe, the appropriate and reasonable practices utilized by
16 hard money lenders to protect and secure their loans, the relationship between hard money
17 lenders and borrowers, and DenSco’s failure to utilize appropriate practices and comport
18 with industry standards.

19 3. The applicable standard of care for the attorneys representing DenSco,
20 including, without limitation, the prior attorneys’ departures from the standard of care in
21 relation to the subject matter of this case and how those departures caused the injuries to
22 DenSco that form the alleged basis of this lawsuit.

23 4. Banking industry practices and policies and procedures relating to the
24 accounts and transactions referenced in Plaintiff’s complaint.

25 5. The nature, authority, and administration of a receivership involving a
26 company such as DenSco, including without limitation, customary practices relating to
27 such a receivership and practices relating to the investigation and review of the company
28 and business by its representatives and counsel.

6. Rebuttal to each and every area of expert witness testimony already identified, or that might be identified in the future, by any party to this litigation.

Dated this 20th day of August, 2021.

GREENBERG TRAURIG, LLP

By: /s/ Nicole M. Goodwin

Nicole M. Goodwin
Attorney for Defendants JPMorgan Chase
Bank, N.A., Samantha Nelson, Kristofer Nelson,
Vikram Dadlani, and Jane Doe Dadlani

COPY of the foregoing served via E-Mail
and U.S. Mail this 20th day of August, 2021
to:

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