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8
9 **SUPERIOR COURT OF ARIZONA**
10 **COUNTY OF MARICOPA**

11 Peter S. Davis, as Receiver of DenSco
Investment Corporation, an Arizona
12 corporation,

13 Plaintiff,

14 v.

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

17 Defendants.

No. CV2017-013832

**DEFENDANT DAVID BEAUCHAMP'S
RESPONSES TO PLAINTIFF'S FIRST
SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

18 Defendant David G. Beauchamp responds as follows to Plaintiff's First Set of Requests
19 for Production of Documents dated May 15, 2018.

20 **GENERAL OBJECTIONS**

21 Each of Mr. Beauchamp's responses, in addition to any specifically stated objections,
22 are subject to and incorporate the following General Objections. The assertion of these or
23 similar objections, additional objections, or a partial response to an individual Request does
24 not waive any of Mr. Beauchamp's General Objections.

- 25 1. Mr. Beauchamp objects to these Requests to the extent the Plaintiff seeks
26 information that is protected from disclosure by the attorney-client privilege,

1 the work-product doctrine, or any other applicable privilege or protection. To
2 the extent Mr. Beauchamp produces, provides or discloses exempt or protected
3 information or documents, such production or disclosure shall not be construed
4 as a waiver by Mr. Beauchamp or his attorneys of such privilege or protection.
5 See Ariz. R. Civ. P. 26(b)(6)(B).

6 **REQUEST NO. 1:**

7 Please produce any documents identified in your answers to Non-Uniform
8 Interrogatories 2, 4, 6, 8, 10, 12, 13 and 14 that have not been produced to the Receiver or the
9 Receiver's counsel as of the date of your response to these Requests.

10 **RESPONSE:**

11 Mr. Beauchamp objects to this Request on the ground that it is overly broad and unduly
12 burdensome, in that it requests documents relating to eight Interrogatories at once. Without
13 waiving this objection, Mr. Beauchamp states that all of the documents referenced in
14 Interrogatories that have not yet been produced to the Receiver can be found at CH_0013624-
15 13946.

16 DATED this 21st day of June, 2018.

17 **COPPERSMITH BROCKELMAN PLC**

18 By: 
19 _____

20 John E. DeWulf
21 Marvin C. Ruth
22 Vidula U. Patki
23 2800 North Central Avenue, Suite 1900
24 Phoenix, Arizona 85004
25 Attorneys for Defendants
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...

1 **ORIGINAL** mailed and emailed this
21st day of June, 2018 to:

2 Colin F. Campbell, Esq.
3 Geoffrey M. T. Sturr, Esq.
4 Joshua M. Whitaker, Esq.
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