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Attorneys for Defendants U.S. Bank National
7 *Association and Hilda H. Chavez*

8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

9 IN AND FOR THE COUNTY OF MARICOPA

10 PETER S. DAVIS, as Receiver of
DENSCO INVESTMENT
11 CORPORATION, an Arizona corporation,

12 Plaintiff,

13 v.

14 U.S. BANK, NA, a national banking
organization; HILDA H. CHAVEZ and
15 JOHN DOE CHAVEZ, a married couple;
JP MORGAN CHASE BANK, N.A., a
16 national banking organization;
SAMANTHA NELSON f/k/a
17 SAMANTHA KUMBALECK and
KRISTOFER NELSON, a married couple;
18 and VIKRAM DADLANI and JANE DOE
DADLANI, a married couple.

19 Defendants.
20

No. CV2019-011499

**THE U.S. BANK DEFENDANTS’
FIRST SUPPLEMENTAL
RESPONSES TO DENSCO
INVESTMENT CORPORATION
SECOND SET OF REQUESTS FOR
PRODUCTION**

(Assigned to the Hon. Daniel Martin)

21 Defendant U.S. Bank National Association (“U.S. Bank”) submits this First
22 Supplemental Response to Densco Investment Corporation Second Set of Requests for
23 Production.

24 **REQUESTS FOR PRODUCTION**

25 **REQUEST FOR PRODUCTION NO. 5:**

26 Organizational charts for any department of the Bank responsible for compliance,
27 fraud detection, money laundering detection, or any other function directed to uncovering
28 crime or fraud during the relevant time period of the Third Amended Complaint.

1 **RESPONSE:**

2 U.S. Bank objects on the following grounds: (1) the request seeks documents that
3 are not relevant to any claim or defense in this case; (2) the terms “compliance” department,
4 “fraud detection” department, “money laundering detection” department, and “any other
5 function directed to uncovering crime or fraud” are so vague and ambiguous that U.S. Bank
6 cannot reasonably discern their meanings; (3) the request is overbroad because it purports
7 to seek information about U.S. Bank departments, products, and services that are unrelated
8 to any claim or defense in this case as to U.S. Bank; (4) the request is overbroad because it
9 seeks documents from time periods that are not relevant to any claim or defense as to U.S.
10 Bank, and (5) the request is disproportionate to the needs of the case. **Notwithstanding**
11 **these objections, U.S. Bank states that, following a reasonable search, it was unable**
12 **to locate any organizational charts for the time period January through April 2014**
13 **for U.S. Bank’s Risk Compliance and Audit (RCA) Anti-Money Laundering group.**

14 **REQUEST FOR PRODUCTION NO. 17**

15 Any policies and procedures pertaining or related to oversight of private bankers
16 and branch personnel. In addition, provide, without limitation, any and all annual or periodic
17 employment reviews for the period covering calendar years 2011 through 2017 of Susan
18 Lazar (who was the private banker for Scott Managed at JP Morgan Chase Bank), Samantha
19 Nelson (f/k/a Samantha Kumbalek) and Vikram Dadlani (both of JP Morgan Chase
20 Bank), and Hilda H. Chavez (U.S. Bank). Include compensation histories which identify
21 base salary and bonus compensation separately, and any performance recognition awards
22 and/or disciplinary actions related to each of the named employees.

23 **RESPONSE:**

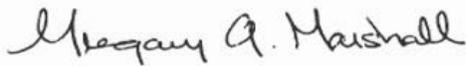
24 U.S. Bank objects on the following grounds: (1) the request seeks documents that
25 are not relevant to any claim or defense in this case; (2) the request is overbroad as to scope
26 and time and therefore seeks documents that are not relevant to any claim or defense as to
27 U.S. Bank; (3) the request seeks a production that is disproportionate to the needs of the
28 case; (4) the phrase “oversight” of “private bankers and branch personnel” is so vague and

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ambiguous that U.S. Bank cannot reasonably discern what is requested; and (5) to the extent the request includes employees other than U.S. Bank employees, U.S. Bank is not in the possession, custody, or control of any responsive documents. **Notwithstanding these objections, and following a reasonable inquiry, U.S. Bank identifies the following documents: Hilda Chavez performance reviews that applied for the time period January through April 2014 (USB_DENSCO001153-1169 (Highly Confidential – Subject to Protective Order)) and compensation and bonus information for Hilda Chavez that applied for the time period January through April 2014 (USB_DENSCO001170-1172 (Highly Confidential – Subject to Protective Order)).**

DATED this 20th day of August, 2021.

SNELL & WILMER L.L.P.

By: 

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1 **CERTIFICATE OF SERVICE**

2 The foregoing was served via e-mail on the following parties this 20th day of
3 August, 2021.

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26
27 /s/ Ranie Rozenberg
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