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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 CLARK HILL'S
RESPONSES TO PLAINTIFF'S
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

18 Defendant Clark Hill PLC responds as follows to Plaintiff's Second Set of Requests
19 for Production of Documents dated June 15, 2018.

20 **GENERAL OBJECTIONS**

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

25 1. Clark Hill objects to this Request to the extent the Plaintiff seeks information
26 that is protected from disclosure by the attorney-client privilege, the work-

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

6 2. Clark Hill objects to this Request to the extent that it seeks to impose obligations
7 broader than or inconsistent with the Arizona Rules of Civil Procedure.

8 **REQUEST NO. 5:**

9 For each invoice Clark Hill issued to DenSco Investment Corporation, please produce
10 documents evidencing all time recorded by Clark Hill timekeepers in Clark Hill's
11 timekeeping system for work performed on DenSco matters during the time period covered
12 by the invoice before any time entries were modified, written off or otherwise eliminated, as
13 well as all documents reflecting the specific changes made to particular time entries after they
14 were entered by a timekeeper and before the invoice in question was issued, or which confirm
15 or seek approval to write off certain charges on the invoice at issue.

16 **RESPONSE:**

17 Clark Hill objects to this Request as unreasonably vague, in that it does not "describe
18 with reasonable particularity" the requested documents as required by Ariz. R. Civ. P.
19 34(b)(2)(A), but instead asks for documents "evidencing" certain data maintained by Clark
20 Hill. Without waiving the foregoing objections, documents responsive to this Request can be
21 found at CH_0017850-17996.

1 DATED this 16th day of July, 2018.

2
3 Coppersmith Brockelman PLC

4 By: 

5 John E. DeWulf

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10 Attorneys for Defendants

11 ORIGINAL mailed and e-mailed this
12 16th day of July, 2018 to:

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14 Geoffrey M. T. Sturr, Esq.

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