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SUPERIOR COURT OF ARIZONA

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COUNTY OF MARICOPA

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

No. CV2017-013832

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Plaintiff,

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

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v.

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

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Defendants.

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Defendant Clark Hill PLC ("Clark Hill") responds as follows to Plaintiff's First Set of
Requests for Production of Documents dated May 15, 2018.

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GENERAL OBJECTIONS

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

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1. Clark Hill objects to these Requests to the extent the Plaintiff seeks information
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 that Clark Hill produces, provides or discloses exempt or protected information
3 or documents, such production or disclosure shall not be construed as a waiver
4 by Clark Hill or its attorneys of such privilege or protection. *See* Ariz. R. Civ.
5 P. 26(b)(6)(B).

6 2. Clark Hill objects to these Requests to the extent that they seek to impose
7 obligations broader than or inconsistent with the Arizona Rules of Civil
8 Procedure.

9 **REQUEST NO. 1:**

10 Documents reflecting data maintained in Clark Hill's accounting and/or file
11 management systems identifying the date on which each matter that Clark Hill had opened
12 for DenSco Investment Corporation was closed.

13 **RESPONSE:**

14 Clark Hill objects to this Request as unreasonably vague, in that it does not "describe
15 with reasonable particularity" the requested documents as required by Ariz. R. Civ. P.
16 34(b)(2)(A), but instead asks for documents "reflecting" certain data maintained by Clark
17 Hill. Without waiving the foregoing objection, documents responsive to this Request can be
18 found at CH_0013617-13619.

19 **REQUEST NO. 2:**

20 Documents evidencing communications within Clark Hill regarding the termination of
21 Clark Hill's representation of DenSco Investment Corporation for each matter that Clark Hill
22 had opened for DenSco Investment Corporation.

23 **RESPONSE:**

24 Clark Hill objects to this Request as unreasonably vague, in that it does not "describe
25 with reasonable particularity" the requested documents as required by Ariz. R. Civ. P.
26 34(b)(2)(A), but instead asks for documents "evidencing" certain communications within

1 Clark Hill. Clark Hill also objects to this Request as it seeks materials protected by the
2 attorney-client privilege, the work-product doctrine, and other applicable privileges and
3 protections. Without waiving the foregoing objections, all documents that may be responsive
4 to this Request have already been produced to the Receiver and are in the Receiver's
5 possession.

6 **REQUEST NO. 3:**

7 Policies, procedures, or other similar written guidance issued to, or accessible by,
8 Clark Hill attorneys during 2014 relating to identifying, addressing and resolving conflicts of
9 interest.

10 **RESPONSE:**

11 Clark Hill objects to this Request to the extent it seeks materials protected by the
12 attorney-client privilege, the work-product doctrine, or any other applicable privilege or
13 protection. Without waiving the foregoing objections, documents responsive to this Request
14 can be found at CH_0013620.

15 **REQUEST NO. 4:**

16 Policies, procedures, or other similar written guidance issued to, or accessible by,
17 Clark Hill attorneys during 2014 relating to the termination of a client representation.

18 **RESPONSE:**

19 Clark Hill objects to this Request to the extent it seeks materials protected by the
20 attorney-client privilege, the work-product doctrine, or any other applicable privilege or
21 protection. Without waiving the foregoing objections, documents responsive to this Request
22 can be found at CH_0013621-13623.

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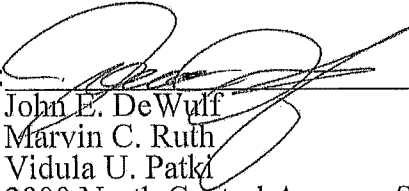
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DATED this 21st day of June, 2018.

COPPERSMITH BROCKELMAN PLC

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