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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’
FIFTH SUPPLEMENTAL
DISCLOSURE STATEMENT**

(Assigned to the Hon. Daniel Martin)

21 Defendants U.S. Bank National Association and Hilda H. Chavez (collectively, the
22 “U.S. Bank Defendants”) provide this Fifth Supplemental Disclosure Statement in
23 accordance with Ariz. R. Civ. P. 26.1.

24 **III. WITNESSES EXPECTED TO BE CALLED AT TRIAL**

25 The U.S. Bank Defendants have not yet identified the witnesses it expects to call at
26 trial, but reserves the right to call the persons identified in Section IV, below.
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1 **IV. PERSONS WHO MAY HAVE RELEVANT KNOWLEDGE OR**
2 **INFORMATION**

3 Without conceding relevancy or admissibility, U.S. Bank identifies the following
4 persons who may have knowledge or information relevant to the subject matter of the
5 action.

6 1. Hilda Chavez (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One
7 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.
8 Chavez currently is the Branch Manager of the U.S. Bank Arrowhead location (6545) and
9 is believed to have used teller box 0003 during the relevant January and April 2014 time
10 period, during which time she was a Branch Assistant. Upon information and belief, Ms.
11 Chavez is expected to have knowledge regarding her interactions with Menaged and
12 Castro during their visits to the U.S. Bank branch location, their purchase and deposit of
13 cashier's checks, her understanding of Menaged's business, and U.S. Bank's policies and
14 banking practices as pertaining to the Easy Investment account and the transactions at
15 issue in the Third Amended Complaint.

16 2. Leslie Nicole Rocha (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,
17 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.
18 Rocha was the Brach Manager of the U.S. Bank Arrowhead location (6545) during the
19 relevant January to April 2014 time period, and Ms. Rocha is believed to have used teller
20 box 0001. Upon information and belief, Ms. Rocha is expected to have knowledge
21 regarding her interactions with Menaged and Castro during their visits to the U.S. Bank
22 branch location, their purchase and deposit of cashier's checks, her understanding of
23 Menaged's business, and U.S. Bank's policies and banking practices as pertains to the
24 Easy Investment account and the transactions at issue in the Third Amended Complaint.

25 3. Julia Wanta (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One
26 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.
27 Wanta was a private banker during the relevant January to April 2014 time period. Upon
28 information and belief, while Ms. Wanta is referenced in the Third Amended Complaint,

1 Ms. Wanta does not have any recollection of any dealings with Menaged or Castro, or the
2 U.S. Bank transactions at issue in the Third Amended Complaint.

3 4. Tatjana Sulaver (c/o Gregory J. Marshall, SNELL & WILMER L.L.P., One
4 Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.
5 Sulaver is a former employee of U.S. Bank who worked at the U.S. Bank Arrowhead Frys
6 location (6545) until on or about February 1, 2014. Ms. Sulaver is believed to have used
7 teller box 0002. Upon information and belief, Ms. Sulaver is expected to testify that she
8 has no recollection of any dealings with Menaged or Castro, or the U.S. Bank transactions
9 at issue in the Third Amended Complaint.

10 5. Daniella Caraveo (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,
11 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.
12 Caraveo is a former employee of U.S. Bank who worked at the U.S. Bank Arrowhead
13 Frys location (6545) during the relevant time period of January 2014 to March 16, 2014.
14 Ms. Caraveo is believed to have used teller box 0004. Upon information and belief, Ms.
15 Caraveo's knowledge of any dealings with Menaged or Castro, or the U.S. Bank
16 transactions at issue in the Third Amended Complaint, are not known.

17 6. Maria Magdalena Villa (c/o Gregory J. Marshall, SNELL & WILMER
18 L.L.P., One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-
19 2202). Ms. Villa is a former employee of U.S. Bank who worked at the U.S. Bank
20 Arrowhead Frys location (6545) during the relevant February 17, 2014 to April 2014. Ms.
21 Villa is believed to have used teller box 0002. Upon information and belief, Ms. Villa
22 may have some limited memory of Castro's cashier's check transactions.

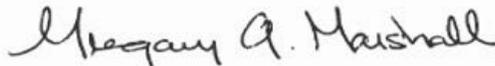
23 7. Jesse Dwayne Head (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,
24 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Mr.
25 Head is a former employee of U.S. Bank who worked at the U.S. Bank Thunderbird
26 location (5109) during the relevant January to April 2014 time period. Mr. Head is
27 believed to have used teller box 0005. Upon information and belief, Mr. Head's
28

1 knowledge of information relevant to the claims and defenses in this litigation is
2 unknown.

3 8. Lorraine Star Parra (c/o Gregory J. Marshall, SNELL & WILMER L.L.P.,
4 One Arizona Center, 400 E. Van Buren, Suite 1900, Phoenix, Arizona 85004-2202). Ms.
5 Parra is a former employee of U.S. Bank who worked at the U.S. Bank Thunderbird
6 location (5109) during the relevant January to April 2014 time period. Ms. Parra is
7 believed to have used teller box 0006. Upon information and belief, Ms. Parra is not
8 expected to have any recollection of any dealings with Menaged or Castro, or the U.S.
9 Bank transactions at issue in the Third Amended Complaint.

10 DATED this 20th day of August, 2021.

11 SNELL & WILMER L.L.P.

12
13 By: 

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21 *National Association and Hilda H.*
22 *Chavez*
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1 **CERTIFICATE OF SERVICE**

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

4 Colin F. Campbell, Esq.
5 Geoffrey M. T. Sturr, Esq.
6 Timothy J. Eckstein, Esq.
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24 *Bank, Samantha Nelson & Vikram Dadlani*

25 /s/Ranie Rozenberg