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AZ CORP COMMISSION
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Brian J. Schulman, SBN 015286
Attorneys for Respondents Patrick Shudak
and Promise Land Properties, LLC

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

DOCKETED

MAY 1 2013

COMMISSIONERS

BOB STUMP, Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

DOCKETED BY

In the matter of:

PATRICK LEONARD SHUDAK, a single man,
PROMISE LAND PROPERTIES, LLC, an Arizona
limited liability company,
and
PARKER SKYLAR & ASSOCIATES, LLC, an
Arizona limited liability company,
Respondents.

DOCKET NO. S-20859A-12-0413

**PRELIMINARY LIST OF
WITNESSES AND EXHIBITS FOR
RESPONDENTS PATRICK
LEONARD SHUDAK AND
PROMISE LAND PROPERTIES,
LLC**

Pursuant to the Rules of Practice and Procedure before the Arizona Corporation Commission, A.A.C. R14-3-101, *et seq.*, and the Third Procedural Order, respondents Patrick Shudak and Promise Land Properties, LLC (the "Respondents") submit their preliminary list of witnesses and exhibits. For the reasons set forth below, Respondents reserve the right to supplement their list of witnesses and exhibits that may be identified between the date of this list and the close of the hearing. The list is subject to amendment and/or supplement at any time prior to or during the scheduled hearing.

On March 6, 2013, Respondents served the Securities Division (the "Division") with

1 discovery requests. On March 26, 2013, the Division filed its response to Respondents'
2 discovery requests, objected to the requests, and refused to produce any discovery. On April 2,
3 2013, Respondents responded to the Division's objections.

4 Today, Respondents received a courtesy copy of the Fourth Procedural Order, denying
5 Respondents request for discovery in its entirety. The order does allow that "there are avenues
6 available to Respondents to further their defense if, after the exchange of Lists of Witnesses
7 and Exhibits, additional documentation, and more time to prepare are needed." Respondents
8 preserve all such "avenues."

9 At this stage, Respondents list of witnesses and exhibits is, at best, tentative. Thus,
10 Respondents reserve the their right to supplement their list of witnesses and exhibits.

11 **Witnesses**

- 12 1. Patrick Shudak
13 2. Alan Thome
14 3. Any witnesses listed on the Division's list of witnesses
15 4. Any witnesses identified through the discovery sought by Respondents
16 5. Any of the alleged investors in the investments described in the Notice of

17 Hearing in this matter.

- 18 6. Any witnesses identified through the exhibits listed by the Division
19 7. Any rebuttal or impeachment witnesses, including expert witnesses to rebut any
20 expert witnesses disclosed by the Division
21 8. Custodians of Record of any exhibits where foundation is required

22 **Exhibits**

- 23 1. All documents previously disclosed by Respondents
24 2. Any exhibits listed on the Division's list of exhibits
25 3. The Division's investigatory file in this matter, including but not limited to the
26 documents requested in Respondents' discovery requests.

LAW OFFICES
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DATED this 1st day of May, 2013.

GREENBERG TRAURIG, LLP

By: 

BRIAN J. SCHULMAN
Attorneys for Respondents Patrick Shudak
and Promise Land Properties, LLC

ORIGINAL and 13 copies of
the foregoing hand-delivered on this
1st day of May, 2013 to:

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

COPY of the foregoing hand-delivered
on this 1st day of May, 2013 to:

Marc Stern
Administrative Law Judge
Arizona Corporation Commission/Hearing Division
1200 W. Washington Street
Phoenix, AZ 85007

COPY of the foregoing emailed/mailed
on this 1st day of May, 2013 to:

Matthew J. Neubert, Director
Ryan Millicam
Arizona Corporation Commission
Securities Division
1300 West Washington Street, 3rd Floor
Phoenix, AZ 85007

