

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE:	§	Chapter 11
	§	
ORION PROCESSING LLC,	§	Case No. 15-10279-tmd
	§	
Debtor.	§	Judge Tony M. Davis
	§	Courtroom No. 1
	§	
	§	Hearing on Motion to Convert Case
	§	to Chapter 7 [Dkt. 107]
	§	
	§	August 19, 2015 @ 8:00 a.m.

THE STATE OF OREGON, OREGON DEPARTMENT OF JUSTICE
AMENDED WITNESS AND EXHIBIT LIST

I. Witnesses

1. David Klein
2. Daren Scott
3. Tracy Parsons
4. Steve Speed
5. Janice Davenport
6. Jonathon Sauseda
7. Ray Fisher
8. JKB Financial Corporate Representative
9. Thomas B. Carter – Federal Trade Commission
10. Randall Nelson – Colorado Investigator
11. Paola Z. Barry – Connecticut Investigator
12. David Evers – North Carolina Investigator
13. Krista Carlson – North Carolina State Bar Investigator
14. Tim Batchelor – North Carolina State Bar Investigator
15. Ed White – North Carolina State Bar Investigator
16. Patricia Swansick – Oregon Investigator
17. Mark Porter – Washington Investigator

Any witness called by any other party and rebuttal witnesses if necessary.

II. Exhibits State of Oregon will be using electronic exhibits. Electronic exhibits will be provided to parties receiving ECF notification.

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
1	Debtor's Current Schedules						
2	Debtor's Current Statement of Financial Affairs						
3	World Law Group and World Law Direct Web Pages ([116], Ex. 3]						
4	Debtor's Responses to Administrator's First Set of Written Discovery (Case No. 2014-cv-31779)						
5	Andrews Kurth Letter dated July 30, 2015						
6	Association of the Bar of the City of New York 2012 Survey of Applicable Debt Management State Laws						
7	Affidavit of Tracy Parson						
	STATE OF OREGON LITIGATION CASE NO. 1307-09347						
8	Investigation Affidavit						
9	Oregon Complaint Against Debtor dated 02-13-2015						
10	Ex Parte Temporary Restraining Order dated 07-02-2013						
11	Preliminary Injunction dated 07-12-2013						
12	Affidavit of Randall Nelson						
13	Affidavit of Katherine L. Ewing						
14	Affidavit of James Fisher						
15	Affidavit of Jermaine F. Brown						
16	Affidavit of Joshua R. Karns						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
17	Affidavit of Karen M. Oakes						
18	Affidavit of Michael R. Campbell						
19	Declaration of Hope Jentis						
20	Affidavit of Janice E. Davenport						
21	Affidavit of Alice Calkins						
22	Affidavit of Kathleen Biley						
23	Affidavit of Sheri D' Alessandro						
24	Affidavit of Lorinda Schwarz						
25	Haskins' PayPal Adept Legal Services						
26	Transcript of Steve Speed Deposition taken 05-09-2014 – FILED UNDER SEAL						
27	Transcript of David Klein Deposition taken 09-03-2014 – FILED UNDER SEAL						
28	Transcript of Ian Raney Deposition taken 09-11-2014 – FILED UNDER SEAL						
29	Transcript of Raymond D. Brock Deposition taken 12-17-2014 – FILED UNDER SEAL						
30	Transcript of Bryan Stephen Rodenberg Deposition taken 01-20-2015 – FILED UNDER SEAL						
31	Transcript of Brent Hampton Deposition taken 07-22-2014 – FILED UNDER SEAL						
32	Order Finding Orion Processing LLC in Contempt in Case No. 1307-09347 dated April 7, 2015						
33	Transcript of Contempt Hearing in Case No. 1307-09347						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
34	Order Certifying Global Client Solutions, LLC's Appeal as Frivolous and Denying Motion to Stay Adversary Proceeding (Adv. No. 14-01507-SBB, Colorado), dated July 2, 2015						
35	Email from Gopi Krishnan forwarding draft Answer to Complaint (NC Case No. 14CVD00050) <i>Discovery Bank v. Everett</i> FILED UNDER SEAL						
36	Screen Shot of Properties of Answer to Complaint (NC Case No. 14CVD00050) <i>Discovery Bank v. Everett</i> FILED UNDER SEAL						
	STATE OF COLORADO CASE NO. 2014 CV 31779						
37	Investigation Affidavit						
38	3/19/15 Order Entering Default and Report of Hearing Master, <i>People of the State of Colorado v. Swift Rock Financial et al</i> , Colorado Supreme Court Case No. 14SA282						
39	4/27/15 Order of Injunction, <i>People of the State of Colorado v. Swift Rock Financial et al</i> , Colorado Supreme Court Case No. 14SA282						
40	10/14/14 Corrected Findings of Fact, Conclusions of Law and Order, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						
41	7/27/15 Default Judgment Against Bradley J. Haskins, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						
42	First Amended Complaint, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
43	9/25/12 Order of Default Judgment, <i>Joy Locke-Odell v. Orion Processing LLC</i> , US District Court, District of Kansas Case No. 12-CV-2009						
44	9/10/15 Stipulation Regarding Exhibits for Preliminary Injunction Hearing, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						
45	Jay Carlin Deposition Transcript – March 17, 2015						
46	9/25/12 Email from Jay Carlin to Ms. Diamon (Carlin Deposition Exhibit 11)						
47	1/5/13 Email from World Law Attorneys to audreyjeanm@gmail.com (Carlin Deposition Exhibit 12)						
48	9/5/12 Email from World Law Attorneys to macd502@gmail.com (Carlin Deposition Exhibit 13)						
49	World Law Client Service Agreement with Ralph Hulse (Carlin Deposition Exhibit 14)						
50	AAA Claim form for Karrie Hultgren (Carlin Deposition Exhibit 16)						
51	4/5/13 Email from Bryan Rodenberg to ag@mljfirm.com (Carlin Deposition Exhibit 17)						
52	AAA Claim form for Bonnie Carter (Carlin Deposition Exhibit 18)						
53	AAA Claim form for Christine Hitchcock (Carlin Deposition Exhibit 19)						
54	9/26/13 Email from Zachary Denton to AAA (Carlin Deposition Exhibit 20)						
55	AAA Claim form for Catherine Diamon (Carlin Deposition Exhibit 21)						
56	Defendants Position Statement Regarding Issues Relevant to PI Hearing, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779 (Carlin Deposition Exhibit 22)						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
57	10/18/13 Email from Deizha Arellano of AAA regarding Katherine Ewing (Carlin Deposition Exhibit 23)						
58	Plaintiffs' First Set of Interrogatories (North Carolina Litigation) (Carlin Deposition Exhibit 24)						
59	Orion Processing Supplemental Responses to First Set of Interrogatories (North Carolina Litigation) (Carlin Deposition Exhibit 25)						
60	Joshua Primm Deposition Transcript – January 27, 2015						
61	Joshua Primm Call Log (Primm Deposition Exhibit 3)						
62	Gopi Krishnan Affidavit (Primm Deposition Exhibit 7)						
63	World Law Notice of Representation Letter to Sawaya, Rose & Kaplan (Primm Deposition Exhibit 8)						
64	World Law Notice of Representation Letters to Sawaya, Rose & Kaplan (Primm Deposition Exhibit 9)						
65	Kyle Sciolaro Deposition Transcript – March 20, 2015						
66	Sciolaro Response to Request for Documents (Sciolaro Deposition Exhibit 28)						
67	Kyle Sciolaro Affidavit (Sciolaro Deposition Exhibit 29)						
68	Gopi Krishnan Affidavit (Sciolaro Deposition Exhibit 30)						
69	Andrew Richner Deposition Transcript – April 2, 2015						
70	World Law “Who We Are” Webpage (Richner Deposition Exhibit 38)						
71	Kevin Hendrick Deposition Transcript – April 2, 2015						
72	Ariel Berschadsky Deposition Transcript – May 14, 2015						
73	6/8/11 Email String With Brad Haskins (Berschadsky Deposition Exhibit 66)						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
74	8/2/11 Email String With Brad Haskins (Berschadsky Deposition Exhibit 67)						
75	1/20/12 Email String Involving Berschadsky (Berschadsky Deposition Exhibit 68)						
76	Gopi Krishnan Affidavit (Berschadsky Deposition Exhibit 69)						
77	Donna Cano Deposition Transcript – May 14, 2015						
78	Your Wall Street Office Webpage (Cano Deposition Exhibit 41)						
79	Your Wall Street Office Information Page for Brad Haskins (Cano Deposition Exhibit 42)						
80	Bank of America Records for WLD Price Global Account 4830 0391 3559						
81	12-15-14 Affidavit of Jade Phelan of Global Client Solutions						
82	WLD Price Global Secretary of State Filings						
83	State of Colorado Requests for Admission to Scott and Klein and Orion, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						
84	Scott and Klein Answers to Colorado’s Request for Admission, <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						
85	6/1/15 Richard Rose Affidavit						
86	Notice of Attorney Representation Form (Produced in Colorado Litigation as Bates No. Orion – 0152)						
87	Orion Discovery Responses (Illinois Litigation)						
88	Orion Processing Response to Motion for Partial Summary Judgment (Colorado Litigation), <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
89	Orion Processing Responses to First Set of Written Discovery (Colorado Litigation), <i>State of Colorado et al v. Orion Processing LLC et al</i> , Denver District Court Case No. 14CV31779						
90	World Law Debt Settlement Web Page (Produced in Colorado Litigation as Bates No. COAG_03157-3168 and 3153 – 3154)						
91	Katherine Ewing Client Service Agreement (Colorado Preliminary Injunction Hearing Exhibit 3)						
92	Orion Responses to First Set of Discovery in North Carolina Litigation (Colorado Preliminary Injunction Hearing Exhibit 5)						
93	Colorado Administrative Subpoena to Orion Processing (Colorado Preliminary Injunction Hearing Exhibit 12)						
94	Answer of World Law Client Filed in 12C2998, Douglas County Court (Colorado Preliminary Injunction Hearing Exhibit 19)						
95	Answer of World Law Client Filed in 12C43608, Adams County Court (Colorado Preliminary Injunction Hearing Exhibit 20)						
96	Answer of World Law Client Katherine Ewing Filed in 12C26360, Adams County Court (Colorado Preliminary Injunction Hearing Exhibit 27)						
97	9/23/13 Email to Katherine Ewing (Colorado Preliminary Injunction Hearing Exhibit 28)						
98	2/27/13 Email from Connie Avgervinos regarding Ewing AAA Arbitration (Colorado Preliminary Injunction Hearing Exhibit 32)						
99	World Law Notice of Representation letter regarding Ralph Hulse (Colorado Preliminary Injunction Hearing Exhibit 36)						
100	Email from Juanise Oliver to Ralph Hulse (Colorado Preliminary Injunction Hearing Exhibit 38)						

Exhibit No.	Description	M	O	O	A	D	Disposition After Trial
Oregon		A	F	B	J	D	
	STATE OF CALIFORNIA	R	E	J	E	D	
	CASE NO. SACV13-01267-JST (JEMx)	E	R	E	C	I	
101	World Law Notice of Representation Letter to Machol & Johannes (Colorado Preliminary Injunction Hearing Exhibit A)	D	D	T	T	E	
102	Investigation Affidavit						
103	Complaint for Permanent Injunction and Other Relief dated 08-20-2013						
104	Order Granting Plaintiff's Motion for Sanctions of Default Judgment dated 04-21-2015						
105	California Investigative File						
	STATE OF CONNECTICUT						
106	Affidavit of Patrick Ring						
107	Certification of the Banking Commissioner						
108	Banking Commissioner's Final Decision issued against Orion/ World Law						
109	Banking Commissioner's Notice issued against Orion/World Law						
110	Connecticut Administrative Agency Record						
	STATE OF ILLINOIS						
	CASE NO. 2010-CH 167						
111	Investigation Affidavit						
112	Amended Motion for Preliminary Injunction as to Defendant Orion Processing LLC d/b/a World Law Processing filed 05-28-2014						
113	Order Granting Plaintiff's Amended Motion for Preliminary Injunction filed 09-17-2014						
114	Transcript of Derin Scott [sic] Deposition taken 09-27-2013						
115	Illinois Investigative File						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
	STATE OF NORTH CAROLINA CASE NO. CVS 007161						
116	Investigation Affidavit						
117	Complaint filed 05-22-2013						
118	Motion for Temporary Restraining Order and Preliminary Injunction filed 05-22-2013						
119	Temporary Restraining Order filed 05-23-2013						
120	Preliminary Injunction Order filed 06-04-2013						
121	Amended Complaint filed 06-25-2014						
122	Exhibits to Amended Complaint filed 06-25-2014						
123	Motion for Civil Contempt filed 12-05-2014						
124	Order Granting Sanctions (12-CVD-972) <i>Citibank, N.A. v. Manning</i>						
125	Order Granting Sanctions (14-CVD-151) <i>Discovery Bank v. Cox</i>						
126	Order Granting Sanctions (11-CVD-751) <i>Citibank, N.A. v. Age</i>						
127	Order Granting Sanctions (13-CVD-283) <i>Citibank, N.A. v. Brown, Jr.</i>						
128	Memorandum Report of Roger Peugh with check breakdown by State						
129	Order Appointing Trustee filed 11-04-2014						
130	Notice of Filing of Confidential Trustee Information filed 02-04-2015						
131	Interim Monthly Status Report by Trustee for January 2015						
132	Interim Monthly Status Report by Trustee for February 2015						
133	Trustee's Response to Affidavit of David S. Klein filed 04-24-2015						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
134	Affidavit of Atty Andrew Hoke						
135	Affidavit of Atty Gregory Cowan						
136	Affidavit of Investigator Dave Evers						
137	Affidavit of Michael Henry						
138	Affidavit of Richard Sorrell						
139	Affidavit of Tim Batchlor						
140	Affidavit of Tracy Parsons						
141	Affidavit of John Littleton						
142	Affidavit of Teresa Smith						
143	Transcript of Derin Robert Scott Deposition taken 01-30-2015						
	STATE OF WASHINGTON CASE NO. 14-2-02029-2						
144	Investigation Affidavit						
145	Civil Investigative Demand for Answers to Interrogatories filed 03-14-2014						
146	Petition to Enforce Civil Investigative Demand Pursuant to RCW 19.86.110 filed 10-22-2014						
147	Declaration of Marc Worthy In Support of Petition to Enforce Civil Investigative Demand Pursuant to RCW 19.,86.110 filed 10-22-2014						
148	Declaration of Lesli Ashley in Support of Petition to Enforce Civil Investigative Demand Pursuant to RCW 19.86.110 filed 10-22-2014						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
149	Order to Compel Petition to Enforce Civil Investigative Demand Pursuant to RCW 19.86.110 filed 11-21-2014						
150	Order Granting Voluntary Dismissal Without Prejudice filed 02-11-2015						
	MISCELLANEOUS						
151	Email from Joshua Wade to Gil Medeiros dated 8/23/11 regarding "Orion Processing now World Law Debt"						
152	Email from David Klein to Gil Medeiros, Craig Johnston, and Ian Raney dated 7/8/13 regarding "NC and Oregon"						
153	World Law Group Announcement regarding "Important Accounting & Banking Changes dated 8/5/14"						
154	Complaint filed 8/25/14 in Case No. 2:14-CV-6643, <i>Consumer Financial Protection Bureau v. Global Client Solutions</i> , in the United States District Court, Central District of California						
155	Stipulated Final Judgment and Consent Order filed 8/25/14 in Case No. 2:14-CV-6643, <i>Consumer Financial Protection Bureau v. Global Client Solutions</i> , in the United States District Court, Central District of California						
156	Email from Dave Klein to undisclosed recipients dated 8/27/14 regarding "Hearing"						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
157	Plaintiffs' Verified Application for Temporary Restraining Order, and Application for Temporary and Permanent Injunctive Relief filed 8/27/14 in Cause No. D-1-GN-14-003224, <i>World Law Group, et al. v. Global Client Solutions</i> , in the 201 st Judicial District Court of Travis County, Texas						
158	Sworn Motion for Pro Hac Vice Admission of Philip S. Van Der Weele filed 8/29/14 in Cause No. D-1-GN-14-003224, <i>World Law Group, et al. v. Global Client Solutions</i> , in the 201 st Judicial District Court of Travis County, Texas						
159	Plaintiffs' Motion in Support of Sworn Motion for Pro Hac Vice Admission of Philip S. Van Der Weele filed 8/29/14 in Cause No. D-1-GN-14-003224, <i>World Law Group, et al. v. Global Client Solutions</i> , in the 201 st Judicial District Court of Travis County, Texas						
160	Temporary Restraining Order filed 8/29/14 in Cause No. D-1-GN-14-003224, <i>World Law Group, et al. v. Global Client Solutions</i> , in the 201 st Judicial District Court of Travis County, Texas						
161	Defendant's Notice of Filing Rule 11 Agreement filed 9/17/14 in Cause No. D-1-GN-14-003224, <i>World Law Group, et al. v. Global Client Solutions</i> , in the 201 st Judicial District Court of Travis County, Texas						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
162	Plaintiffs' Notice of Nonsuit without Prejudice filed 9/22/14 in Cause No. D-1-GN-14-003224, <i>World Law Group, et al. v. Global Client Solutions</i> , in the 201 st Judicial District Court of Travis County, Texas						
163	Letter from Lisa Vance to Brad Haskins dated 10/30/14 regarding Cause No. D-1-GN-001534, <i>Jack Tenold and Jana Tenold, Plaintiffs vs. Orion Processing, LLC, et al.</i> in the District Court, 250 th Judicial District, Travis County, Texas						
164	Email from management@wlsouth.com to 'Affiliate Service Director' dated 11/11/14 regarding "A Message from World Law Processing"						
165	Motion to Determine Excessiveness and Unreasonableness of Attorney Fees under 11 U.S.C. 329(b) filed 2/7/13 in Case No. 12-58738, <i>In re Christine M. Corbi</i> , in the United States Bankruptcy Court for the Southern District of Ohio, Eastern Division						
166	Report of Disgorgement by World Law Group, et al. filed 4/29/13 in Case No. 12-58738, <i>In re Christine M. Corbi</i> , in the United States Bankruptcy Court for the Southern District of Ohio, Eastern Division						
167	Settlement Agreement filed 5/13/14 in Case No. 14-07005, <i>Kaler v. Swift Rock Financial Inc. et al. (In re Gangi)</i> , in the United States Bankruptcy Court of North Dakota						

Exhibit No. Oregon	Description	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disposition After Trial
168	Affidavit of Derin Scott dated 1/8/15 in Case No. 13-CVS-7161, State of North Carolina, et al. v. Swift Rock Financial, Inc., et al., in the General Court of Justice Superior Court Division, Wake County, North Carolina						
169	Brief of Plaintiffs in Opposition to Defendant Scott’s Motion to Dismiss for Lack of Personal Jurisdiction and to Set Aside Entry of Default (with Exhibits) filed 2/3/15 in Case No. 13-CVS-7161, State of North Carolina, et al. v. Swift Rock Financial, Inc., et al., in the General Court of Justice Superior Court Division, Wake County, North Carolina						
170	Affidavit of Service of Process on Defendant Bradley James Haskins (with exhibits) filed 5/22/15 in Case No. 13-CVS-7161, State of North Carolina, et al. v. Swift Rock Financial, Inc., et al., in the General Court of Justice Superior Court Division, Wake County, North Carolina						
171	JKB Financial Proof of Claim No. 25						
	Any document listed on any other party’s exhibit list.						

Dated: August 19, 2015

Respectfully Submitted,

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By: /s/ Lynn Hamilton Butler
Lynn Hamilton Butler
Texas State Bar No. 03527350

**ATTORNEYS FOR STATE OF OREGON,
OREGON DEPARTMENT OF JUSTICE**

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing pleading was (i) forwarded via this Court's CM/ECF notification system to the parties registered for such service on August 19, 2015 and (ii) duly served upon the following parties this 19th day of August, 2015, by electronic transmission as indicated below:

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/s/ Lynn Hamilton Butler
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