

MEZLMVBD HO II LLC  
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PROFESSIONAL SERVICES INC  
VBE BODY TEMPORARY SERVICES INC

CASE NO 8:13-PF-0888-CED  
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IN RE:

FLORIDA TRUST DIVISION  
COURT MIDDLE DISTRICT OF  
UNITED STATES BANKRUPTCY

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the Welch Subpoena Regions, in-house counsel, Indira Colosimo testified in these cases that she those accounts spanning February 5, 2004 through the date of the Welch Subpoena. As a result of Regions, policies and procedures impacting actions taken or decisions made by Regions regarding and account review/analysis for the MortgageBusiness, and their related entities, accounts, as well as of cancelled checks and deposit slips, reports, and electronic data pertaining to account activity **Exhibit „A”**, requesting numerous documents including bank records (including front and back Examination upon Regions Bank („Welch Subpoena,“) a copy of which is attached hereto as **On October 22, 2012**, Trustee Welch served a Rule 3004 Subpoena Duces Tecum with

**A. Demand Litigation Hold Time-Line**

**II. BACKGROUND**

of certain of its defenses and affirmative defenses, is prohibited from introducing evidence that is predicated upon the Missing Documents, in support Documents (if produced) would have been unfavorable to Regions or, alternatively, that Regions respectfully requests that the Court Order that an adverse inference be drawn in that the Missing below, the elements required for such relief are more than satisfied and, accordingly, the Trustee such a benefit to a party who purposefully hides the ball in an effort to get the upper hand. As shown But the Court's inherent power and Federal Rule of Civil Procedure 37 were designed to prevent enrichment claims and certain of Regions, affirmative defenses to her fraudulent transfer claims, evidence to rebut Regions, defenses to Trustee Herendeen's siding and spinning and unjust unfairly borne that, as Missing Documents (defined below) are, to this day, unavailable as Years consumed by Regions, obstructive, intentional and bad faith discovery abuses have

**I. SUMMARY**

Defenses and Affirmative Defenses („Motion“), inference or, alternatively, to preclude Regions from offering evidence in support of certain