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I. INTRODUCTION

On December 10, 2015, Hayman launched a vicious, predatory “short and distort” attack on UDF, for the sole purpose of lining Hayman’s desperate pockets with money. Hayman falsely told the world UDF was a worthless Ponzi scheme on the verge of collapse, while concealing from the world Hayman’s plan to drive UDF into bankruptcy and acquire UDF’s “well-positioned assets” at a discount through Hayman’s “Distressed Debt Opportunity Fund.” Hayman made extreme efforts to get its Ponzi story out to the world in a way that would cause the most harm to UDF.

UDF brought this action on November 28, 2017, seeking redress for the devastating and intended harm Hayman’s illegal attack caused. On August 21, 2019, a unanimous panel of the Fifth District Court of Appeals found UDF had far exceeded the evidentiary showing necessary to establish a prima facie case that Hayman engaged in an illegal short and distort scheme whereby Hayman widely disseminated false information about UDF’s business in order to destroy UDF and enrich Hayman by over \$100 million.

This case was remanded to the trial court on April 27, 2020. Since then, UDF has uncovered a mountain of evidence to further support its claims, including express documentation of Hayman’s plan to “Drive [UDF’s] stock to zero,” “Push

regulatory bodies [SEC, FBI] to act,” and “prevent UDF from obtaining an auditor.”

On June 30, 2020, the Court ordered this case set for trial on January 18, 2022. The Court indicated that the date would be firm, and that the parties should be prepared to proceed on that date with no continuance. UDF took the Court seriously and has dedicated its time and energy to diligently preparing its case for trial, including taking necessary depositions, so that it may finally have its day in court.

In contrast, the simple truth is that Hayman is afraid to try this case and will do anything to avoid, delay, frustrate and prevent UDF from having its day in court. From inception, Hayman has pursued a variety of delay tactics including: filing a TCPA motion and appealing its loss all the way to the Texas Supreme Court; inundating UDF with over 1200 document requests; attempting to disqualify UDF’s counsel; serving dozens of deposition notices and subpoenas which, after UDF worked with Hayman on dates, Hayman abruptly cancelled; interfering with UDF’s discovery, including failing to comply with a court order to search for documents related to UDF; continually moving the goalposts on what discovery Hayman claims it needs to defend this case, to ensure that UDF can never comply with Hayman’s ever-changing and voluminous requests, and finally,

claiming Hayman cannot take a single deposition without yet even more documents.

When Hayman told the world UDF was a worthless “billion dollar Ponzi scheme”—“one of the largest Ponzi-schemes in Texas history”—Hayman claimed to have done “extensive,” “brilliant” research “spanning two years” and Hayman claimed it understood UDF’s business better than UDF. Hayman never expressed any need to even speak to UDF, let alone see any additional documents before spreading its Ponzi story to everyone who would listen. Yet Hayman now tells this Court that sixteen months after remand, with the vast resources of four law firms, Hayman has been unable to take a single deposition because even after receiving over a million pages of documents (with another million to be produced shortly), Hayman is “not ready” to take depositions of anyone—not UDF, not even a single third party. Hayman’s excuses for failing to take a single deposition in sixteen months are just that—excuses. Hayman’s actions are all part of its strategy to use incomplete discovery as a reason to delay trial in this case for as long as the Court lets it.

Hayman’s Motion to Continue Trial Date and Supplement to Their Motion to Continue (collectively “Motion”) creates a false narrative regarding discovery in this case in an effort to divert the blame for Hayman’s utter and complete failure to take a single deposition. Hayman claims it is being “ambushed” by UDF’s “late”

productions of documents. But Hayman has only itself to blame for the timing of such productions. In reality, UDF has acted diligently and properly in all aspects of discovery, producing vast collections of documents at *twenty-three times the pace of Hayman's production efforts*. And UDF has pushed forward with depositions, even though it has not received all of the documents that Hayman owes UDF under the Court's order, and even though Hayman has not honored numerous promises and agreements it made to provide discovery.

Hayman has failed to show good cause to continue the trial. Despite, this failing, UDF is amenable to a single trial continuance with the limitations discussed below—the use of document discovery as an excuse to delay depositions and trial must stop. UDF's concern is that Hayman's Motion will be the first of many requests for continuances to come. Hayman has failed to make any good faith proposal to finish its never-ending discovery requests with what should be final, narrowly tailored document discovery. Rather, by all indications, Hayman intends to continue down the path of making outrageous discovery demands that would take years to fulfill, all in an effort to avoid letting a jury decide this case.

Consequently, any trial continuance must provide a method by which Hayman must bring its discovery demands to an end in a reasonable fashion so that UDF can proceed with its case without yet another delay. The Court should address not just Hayman's stated need for more time, but also UDF's concern that

Hayman will continue to misuse discovery as a tactic to seek continuances of the trial seriatim. In attacking UDF, Hayman boasted that it had proof that UDF's business was a Ponzi scheme and, after four years of litigation, it is high time that UDF is allowed its day in court.

II. THE TIMING OF UDF'S PRODUCTIONS IN THIS CASE IS A RESULT OF HAYMAN'S DISCOVERY STRATEGY

A. The pace of UDF's production in this case has been *twenty-three times faster than Hayman's production.*

The main excuse Hayman offers for its failure to take a single deposition in this case is that UDF has not produced documents quickly enough. Thus, as an initial matter, UDF must dispel any notion that it has not worked diligently to provide massive document productions in this case. In fact, the size of UDF's production dwarfs that of Hayman, and UDF had produced documents at a far faster pace.

In the 16 months since this case was remanded to the trial Court, Hayman has produced 21,311 documents, totaling 79,321 pages, and still has substantial document production obligations outstanding.¹ Hayman insisted throughout this period that it could not review and produce its documents any faster. In contrast, during this same time period, UDF reviewed and produced 91,371 documents

¹ The facts in this Response are supported by the Declaration of Ellen Cirangle in Support of Response to Hayman's Motion to Continue Trial ("Cirangle Dec.").

totaling 939,291 pages, with an additional approximately 111,372 documents estimated to be over 900,000 pages being produced September 15. Thus, by September 15, UDF will have produced approximately 202,743 documents, totaling approximately 1,839,291 pages. Thus, by page count volume, ***UDF will have produced more than 23 times what Hayman has produced during the same time period.***² And Hayman has claimed that it was unduly burdensome for Hayman to move any faster with its production.

In short, Hayman's complaints regarding the speed of UDF's productions are disproven by Hayman's own stated ability to review and produce documents in this case. The reality is that UDF has provided its production in a timeframe that is 23 times faster than what Hayman has stated would be possible.

To the extent Hayman argues about email, Hayman also gets that wrong. Hayman states UDF has produced "8000 emails" (Motion, at 16) but UDF has produced over 17,000 emails, with another approximately 35,000 emails to be produced in mid-September. UDF has also worked to review and produce tens of thousands of more emails in the possession of its accountants. In contrast, Hayman has produced 9,329 emails.

² That does not even include large additional productions from UDF's accountants that UDF had to review to extract tax information and then produce to Hayman.

B. Hayman's unfocused fishing expedition is designed to make it impossible for UDF to complete its production.

Hayman's Motion creates the false narrative that UDF has been obstructing discovery. Nothing could be further from the truth. UDF has worked diligently and spent significant resources and over 12,000 hours of attorney time trying to satisfy Hayman's never-ending, always shifting document requests in its attempt to find a defense to this case.

Hayman inundated UDF with unfocused and burdensome discovery, serving over 1200 requests that called for every single document in UDF's possession. Now, at the eleventh hour, Hayman has served new, duplicative requests to further disrupt and confuse the document production process.

As the Court recalls, Hayman repeatedly told this Court that it would prove at trial that UDF was a Ponzi scheme. Originally, last year, Hayman did work with UDF to determine what documents it needed to defend its Ponzi scheme allegations. The parties agreed on a massive production (almost a million pages) which included UDF's financials, loan files, bank files and much more. UDF undertook the requested productions, spending over 12,000 hours getting documents to Hayman. Hayman also sought and obtained the complete working papers of UDF's accountants. Surely almost a million pages of core business documents and the entirety of the third-party auditors' working papers was enough for Hayman to determine whether or not UDF was a Ponzi scheme.

However, given that UDF is not a Ponzi scheme, it is not surprising that UDF's documents did not prove Hayman's defense. So then, beginning in January 2021, Hayman began an effort to try and avoid trial. From January 2021 and through the present, Hayman has employed a tactic of abandoning its prior agreements, constantly moving the target of what it is seeking so that UDF can never pin Hayman down to a final set of documents that is capable of being produced, sending requests for email search terms that Hayman knew were impossible to comply with, and otherwise creating a never-ending process whereby Hayman will never be satisfied with anything UDF does. Hayman's requests are unfocused and all over the board, a true fishing expedition seeking varied and voluminous sets of documents.

UDF was unable to work out any reasonable agreement with Hayman because, once Hayman realized it did not want to go to trial, Hayman began making demands for email searches that were intended to prevent an agreement and that were in stark contradiction to the narrow, focused searches Hayman was using to produce its own documents. For example, Defendants recently requested that Plaintiffs search millions of emails to find any email that includes very common words, such as "lender!", or "bank!", or "default!", or "overdue!", or "adverse", or "exten!", or "forbear!", or "disclose", or "settle!", or "reimburse", or "indemnify", or "derivative", or "scheme", or "scam". While seeking to send

Plaintiffs on this wild goose chase, Defendants have strictly limited themselves to searching for just a few narrow search terms, like “UDF.” So clearly Hayman is applying a double standard in its effort to send UDF on endless document searches in order to prevent the case from coming to trial. Hayman likes to tell this Court that it has purported “smoking guns,” but, if so, then Hayman would not need to do everything possible to block progress of the case to trial.

C. Hayman reverted to its SEC defense in June 2021.

It appears Hayman has now reverted to its argument that the (inadmissible) SEC settlement vindicates Hayman. Of course, as briefed many times, the SEC settlement did not accuse UDF of being a Ponzi scheme; indeed, one of Kyle Bass’s closest friends and business associates just testified as to how insignificant the SEC settlement was. UDF will not repeat its arguments here.

Hayman’s theory set forth in its latest Motion (described at pp. 4-10), is that UDF had a “scheme” to transfer money between funds to pay distributions to investors. Hayman harkens its theory to the allegations by the SEC. *See, e.g.*, Motion, at 10. UDF will establish at trial that there was no “scheme,” and that its loans and distributions were all legitimate business practices. Indeed, the SEC itself did not allege anything improper about the very same business practices that

Hayman now relies upon for the cornerstone of its defense.³ But respecting the Court's time and recognizing this is neither the time nor place to prove UDF's case, UDF will not take up the Court's time knocking down Hayman's strawmen.

At issue here is Hayman's claim it is being "ambushed" by UDF's "late" productions of documents that UDF provided to the SEC. But Hayman has only its own lack of diligence to blame for the timing of such production. The SEC settlement was published in 2018, so Hayman has been aware of any such theory since 2018, and indeed (unsuccessfully) argued such theory *ad nauseum* in the TCPA process. UDF objected to producing the SEC documents on July 27, 2020, yet Hayman chose not to move to compel production of these documents until June 2021, when Hayman decided to re-focus on its SEC theory after UDF's massive production of its core business records showed UDF was not a Ponzi scheme. UDF has been nothing but diligent since the Court ordered production, and upon production of the SEC materials, UDF will have produced almost 2 million pages of documents.⁴

³ Hayman's long narrative regarding recently obtaining "smoking guns" in the Whitley Penn documents that UDF somehow hid from Hayman is disproven by Hayman's own argument. The documents and allegations Hayman makes are, according to Hayman, what the SEC's 2018 Complaint concerned. *See, e.g.*, Motion, at 10. This is nothing new or hidden, and certainly wasn't anything that caused the SEC to require any changes in UDF's business practices.

⁴ In its August 20, 2021 Motion for Entry of Order on Defendants' Second Motion to Compel (at p. 4), regarding the SEC documents that UDF will have fully

D. The Whitley Penn email production is a result of Hayman's failure to honor its agreement to provide focused search terms, forcing UDF to expend significant time and resources on the production.

As to the Whitley Penn emails, given the volume of emails between UDF and its accountants, last year Hayman agreed to provide search terms to narrow its requests to relevant information. UDF repeatedly asked Hayman to provide such search terms, and Hayman repeatedly failed to do so. Eventually, given Hayman's abandonment of its prior promises, and its refusal to make any meaningful effort to move this production forward, UDF told Hayman it would undertake the extremely burdensome task of reviewing and producing all of the Whitley Penn emails. UDF told Hayman this would be burdensome and would take months to do.⁵ Thus,

produced by September 15, Hayman states: *"These are the exact documents Defendants need for the defense of this case."* But as further evidence of Defendants' intent never to finalize discovery, the Motion lists other endless motions and massive quantities of documents Hayman intends to pursue.

⁵ The Whitley Penn production, as conveyed to Defendants, has indeed taken up very substantial time and resources, resulting in some slowing of UDF's final production of its other remaining documents. There are several reasons why the Whitley Penn document review is so time-consuming and burdensome. First, UDF has reviewed (or will review) over 42,000 documents in connection with the Whitley Penn review. Second, because Whitley Penn performed work for individuals and entities that are not parties to (and not relevant to) this lawsuit, UDF has to review each document and determine whether the document should be produced in full, withheld in full, or redacted on responsiveness grounds. Third, UDF has to review (and redact or withhold, as appropriate) the Whitley Penn documents for other issues, including: tax-related information, personal identifying information (e.g., social security numbers), personal financial information, and privilege. Fourth, the review of the Whitley Penn documents for tax-related

Hayman understood that its failure to narrow its requests would lead to a drawn-out production schedule. Any complaint Hayman has regarding timing of the production is due to Hayman's actions, not UDF's.

E. Hayman's complaints regarding redactions are unfounded.

Hayman complains UDF has made "excessive redactions" that have caused Hayman problems. Because Hayman has refused to ever remotely tailor its discovery, forcing UDF to produce entire sets of files and emails, UDF has necessarily had to make redactions according to a proper protocol for information unrelated to this case, privileged information, and private financial information that is swept up by these vast, overbroad productions. Hayman likewise made vast redactions to its production, a fact that it consistently fails to disclose to the Court. UDF understands that in the course of this massive project, there can be questions or issues that come up regarding redactions. The parties set up a specific protocol for that. Hayman has utilized that protocol, sending voluminous lists of documents with redactions it had questions on, and UDF has responded to all such inquiries in a timely manner.

information is particularly time-consuming because Whitley Penn assisted in the preparation of UDF's tax returns. In sum, these documents include sensitive information and must be carefully reviewed. UDF is largely finished with this production.

F. Hayman has failed to fulfill its discovery obligations.

At the same time Hayman was searching for a defense and forcing UDF to expend more than twenty times the resources Hayman was expending on its production, Hayman was refusing to fulfill its discovery obligations. Throughout the discovery process, UDF has worked with Hayman to narrowly tailor its discovery to the issues in this case and has never demanded or sought any unreasonable or burdensome volume of discovery.

Hayman repeatedly stated it was too burdensome to produce more than a few thousand emails every three weeks, thus taking almost a year to produce approximately 17,000 documents. In January 2021, Hayman announced it was going to purposefully hold back its further productions as discovery leverage. UDF obtained a Court order which required Hayman to finalize production in key areas of discovery by July 10, 2021. Hayman made no effort to comply with key parts of that Order and admitted that it had not previously done a proper search for documents, yet Hayman has done nothing to get in compliance with the Court's order or do the searches it failed to do the first time. *See Cirangle Dec., Exs. A, B.* UDF also discovered that Hayman violated the Court's 2018 order regarding discovery for the TCPA motion by failing to provide documents directly called for in that Order. In addition, Hayman has failed to produce wide swaths of

documents, including its financials, investor redemptions and many other important documents.

When UDF tries to work cooperatively with Hayman on discovery, Hayman does not fulfill its promises. For example, Hayman agreed to provide a revised privilege log by August 4, but never did so and has ignored subsequent communications on that subject. Hayman declared, unilaterally, that it would not cooperate in any depositions going forward and would file a motion to block the taking of depositions. Cirangle Dec., Ex. C. Hayman could not be more transparent in its aim to derail discovery and trial.

III. THE TRIAL DATE SHOULD BE RESET ONLY ONCE AND TO A DATE THAT ENSURES IT WILL GO FORWARD

The circumstances Hayman blames for its failure to be ready for trial are the result of the tactics Hayman has employed for the 16 months since this case was remanded. The gamesmanship must end now.

Procedures must be put in place to curtail Hayman's tactical refusal to move forward in discovery and excuses. The only way to get this case to trial is to adhere to deadlines that will require the parties to focus on document discovery that really matters and move forward with depositions.

UDF proposes the following schedule to resolve both Hayman's stated need for more time, UDF's valid concern that this will trigger an unending set of delays, and UDF's reasonable desire to have a firm trial date that will be certain:

- Except for deposition subpoenas to third parties, written discovery is closed (as of August 20, 2021) and will not be reopened beyond what is already pending (including UDF's Motion for Net Worth Discovery).
- Any motions to compel must be filed by November 7, 2021.
- The trial date is moved to May 23, 2022. UDF does not believe Hayman's proffered date of March 21, 2022 is one Hayman intends to be prepared for, based upon the statements in Hayman's Motion, and UDF believes setting the trial on that date will simply result in yet another continuance. But given Hayman's representation to the Court that they could be ready for trial on March 21, Hayman can have no excuse not to be ready with the additional time provided by the May 23 trial date.
- Fact discovery cut off (other than written discovery as set forth above) and expert deadlines will all be governed by Judge Montgomery's standard scheduling order, as they currently are.

UDF understands that Hayman agrees to the May 23 trial date and the expert deadlines but does not agree to the additional cut-off dates proposed by UDF.

UDF is unwilling to move the trial date to May 23 if such procedures are not put in place to ensure that this is the only trial continuance in this matter.

DATED: August 27, 2021

Respectfully submitted,

By: /s/ Ellen A. Cirangle

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CERTIFICATE OF SERVICE

This is to certify that on August 27, 2021, a true and correct copy of the foregoing instrument was delivered to Defendants' counsel of record through a court-approved electronic filing system.

/s/ Ellen A. Cirangle
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