

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

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MICHAEL S. PIECIAK, in his official )  
capacity as COMMISSIONER OF THE )  
VERMONT DEPARTMENT OF )  
FINANCIAL REGULATION, as )  
LIQUIDATOR of GLOBAL HAWK )  
INSURANCE COMPANY RISK )  
RETENTION GROUP, )  
) )  
Plaintiff, )  
) )  
v. )  
) )  
JASBIR S. THANDI, )  
GLOBAL CENTURY INSURANCE )  
BROKERS, INC., JASPREET SINGH )  
PADDA and QUANTBRIDGE )  
CAPITAL LLC, )  
) )  
Defendants. )

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Case No.: 2-20-cv-173

**LIQUIDATOR’S MOTION FOR SANCTIONS (DEFAULT)  
AGAINST DEFENDANT JASBIR S. THANDI**

Pursuant to Federal Rule of Civil Procedure 37(b)(2)(A)(vi), plaintiff Michael S. Pieciak in his official capacity as Commissioner of the Vermont Department of Financial Regulation, as Liquidator of Global Hawk Insurance Company Risk Retention Group (“Liquidator”), respectfully moves for sanctions in the form of entry of default against defendant Jasbir S. Thandi (“Thandi”) and for other and further relief as the Court deems just and proper. There exists good cause for this motion because Thandi has willfully ignored the Court’s order to produce highly relevant documents. In support thereof, the Liquidator submits his Memorandum of Law dated March 9, 2022, which attaches Thandi’s Responses to Plaintiff’s Second Set of

Document Requests as Exhibit A, and the Affidavit of Eric A. Smith, certifying that counsel have conferred in good faith to resolve this dispute without success.

WHEREFORE, the Liquidator respectfully requests that this Court:

- A. Grant Plaintiff's Motion for Sanctions (Default) against defendant Jasbir S. Thandi;
- B. Enter default against defendant Jasbir S. Thandi; and,
- C. Grant such other and further relief as justice may require.

Dated: March 9, 2022

MICHAEL S. PIECIAK, COMMISSIONER OF  
THE VERMONT DEPARTMENT OF  
FINANCIAL REGULATION, SOLELY AS  
LIQUIDATOR OF GLOBAL HAWK  
INSURANCE COMPANY RISK RETENTION  
GROUP,

By his attorneys,

\_\_\_\_\_/s/Jennifer Rood\_\_\_\_\_  
Jennifer Rood, Assistant General Counsel and  
Special Assistant Attorney General  
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*Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of March 2022, a true and correct copy of Liquidator's Motion for Sanctions (Default) was served by ECF on all counsel of record.

\_\_\_\_/s/Jennifer Rood\_\_\_\_\_  
Jennifer Rood

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

\_\_\_\_\_  
MICHAEL S. PIECIAK, in his official  
capacity as COMMISSIONER OF THE  
VERMONT DEPARTMENT OF  
FINANCIAL REGULATION, as  
LIQUIDATOR of GLOBAL HAWK  
INSURANCE COMPANY RISK  
RETENTION GROUP,

Plaintiff,

v.

JASBIR S. THANDI,  
GLOBAL CENTURY INSURANCE  
BROKERS, INC., JASPREET SINGH  
PADDA and QUANTBRIDGE  
CAPITAL LLC,

Defendants.  
\_\_\_\_\_

Case No.: 2-20-cv-173

**AFFIDAVIT OF ERIC A. SMITH REGARDING  
LIQUIDATOR'S MOTION FOR SANCTIONS (DEFAULT)  
AGAINST DEFENDANT JASBIR S. THANDI**

I, Eric A. Smith, being sworn, hereby state as follows:

1. I am an attorney at law admitted *pro hac vice* to practice before this Court. In this action, I am counsel of record for Plaintiff Michael S. Pieciak, in his official capacity as Commissioner of the Vermont Department of Financial Regulation, as Liquidator of Global Hawk Insurance Risk Retention Group ("Liquidator"). I make this declaration regarding the Liquidator's Motion for Sanctions (Default) Against Defendant Jasbir S. Thandi (the "Motion").

2. The Motion is a dispositive motion. However, on March 8, 2022, I conferred by telephone with Michael Racette, counsel for defendant Jasbir S. Thandi, for approximately 10 minutes regarding the Motion and the related motion to suspend discovery schedule.

3. **Despite conferring in good faith, we were unable to resolve the dispute regarding the Motion.**

**I certify under penalty of perjury that the foregoing is true and correct.**

**Executed on March 9, 2022.**

  
\_\_\_\_\_  
**Eric A. Smith**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

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MICHAEL S. PIECIAK, in his official capacity )  
as COMMISSIONER OF THE VERMONT )  
DEPARTMENT OF FINANCIAL )  
REGULATION as LIQUIDATOR of GLOBAL )  
HAWK INSURANCE COMPANY RISK )  
RETENTION GROUP )

DOCKET NO. 2:20-CV-00173

Plaintiff, )

v. )

JASBIR S. THANDI, GLOBAL CENTURY )  
INSURANCE BROKERS, INC., JASPREET )  
SINGH PADDA and QUANTBRIDGE )  
CAPITAL LLC, )

Defendants. )

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**LIQUIDATOR’S MEMORANDUM OF LAW IN SUPPORT OF MOTION  
FOR SANCTIONS (DEFAULT) AGAINST DEFENDANT JASBIR S. THANDI**

**INTRODUCTION**

Plaintiff Michael S. Pieciak, Commissioner of the Vermont Department of Financial Regulation, as Liquidator (“Liquidator”) of Global Hawk Insurance Company Risk Retention Group (“Global Hawk”), by and through his attorneys, hereby submits his Memorandum of Law in Support of Plaintiff’s Motion for Sanctions under Federal Rule of Civil Procedure 37(b) against defendant Jasbir S. Thandi (“Thandi”). Thandi has failed to comply with the deadline for production of documents under this Court’s order and a default judgment should be entered against him for this failure. Fed. R. Civ. P. 37(b)(2)(A)(vii). His refusal to produce highly relevant documents in response to the order is deliberate and willful.

## **BACKGROUND**

The Parties. As set forth in the Complaint, this is an action by the Commissioner of the Vermont Department of Financial Regulation in his capacity as Liquidator of Global Hawk against the Defendants Thandi, Global Century Insurance Brokers, Inc. (“GCIB”), Jaspreet Singh Padda (“Padda”) and QuantBridge Capital LLC (“QuantBridge”). Dkt. No. 1.

Global Hawk is a Vermont-domiciled insurance company and risk retention group. It was declared to be insolvent and placed in liquidation by Order of Liquidator entered by Vermont Superior Court, Washington Unit (“Vermont Court”) in Docket No. 196-5-20-Wncv on June 8, 2020. The Order of Liquidation appointed the Commissioner as Liquidator of Global Hawk. Complaint ¶ 2.

Thandi is and at all relevant times was the President and Treasurer of Global Hawk, as well as a director of Global Hawk. Complaint ¶ 5; Thandi Answer ¶ 5. Thandi is and at all relevant times was also the President and 100% owner of GCIB. Complaint ¶ 6; Thandi Answer ¶ 6. At all relevant times, GCIB managed the business of Global Hawk pursuant to a managing general agreement with Global Hawk. *Id.*

Thandi appeared and filed an answer on April 5, 2021. Dkt. No. 25. GCIB did not respond to the Complaint, and a Clerk’s Default was entered against GCIB on February 26, 2021. Dkt. No. 21.

Padda and QuantBridge were dismissed from this action on February 18, 2022 pursuant to a settlement with the Liquidator. Dkt. No. 92.

The Complaint. As set forth in the Complaint, the Liquidator alleges that the Defendants engaged in a scheme to defraud Global Hawk through misappropriation of its assets and misrepresentation of its financial condition that concealed Global Hawk’s insolvency from the Vermont Department and damaged the policyholders and claimants who look to the company for insurance protection.

Among other things, the Liquidator alleges that Thandi as officer of Global Hawk knowingly signed false financial statements that hid Global Hawk's insolvency and overstated its assets. Complaint ¶¶ 23, 71. GCIB and Thandi (GCIB's President and 100% owner) managed Global Hawk's business and investments and maintained financial records that overstated Global Hawk's assets and provided information underlying the false financial statements. Complaint ¶¶ 6, 23, 28, 38.

The Complaint alleges that Thandi borrowed funds from Stifel for purposes unrelated to Global Hawk and paid off the loans in great part using \$10.7 million of Global Hawk funds. Complaint ¶¶ 24-27. The Complaint also alleges that Thandi and GCIB falsely documented purported capital contributions to Global Hawk by preparing false bank deposit receipts and bank statements and providing them to the Captive Manager. Complaint ¶ 28. In particular, Thandi signed Subordinated Notes reflecting purported contributions of \$13.6 million in 2017 and \$9.5 million in 2018 when no more than \$3.5 million was contributed. Complaint ¶¶ 30, 35. GCIB provided the Captive Manager with scanned copies of checks signed by Thandi from Thandi's personal account which were not in fact deposited or false deposit slips. Complaint ¶¶ 32-33, 35-36. The Complaint also alleges that Thandi and GCIB misappropriated Global Hawk assets by providing the Captive Manager with false bank and investment statements that concealed the misappropriation of Global Hawk assets. Complaint ¶¶ 38-46.

The Discovery Requests. On April 21, 2021, the Liquidator served document requests and interrogatories on Thandi. On June 4, 2021, Thandi responded and asserted the Fifth Amendment privilege in response to every document request and every interrogatory. *See* Thandi's Response to Liquidator's First Set of Document Requests and Interrogatories, attached as Exhibit A to the Plaintiff's Memorandum of Law in Support of Motion to Compel Discovery from Defendant Jasbir S. Thandi (Dkt. No. 47) ("Memorandum in Support of Motion to Compel"). The requests specifically called for the



production of responsive documents including documents from GCIB. Memorandum in Support of Motion to Compel at 5.<sup>1</sup>

Motion to Compel Discovery. The Liquidator filed the Plaintiff's Motion to Compel Discovery from Defendant Jasbir S. Thandi ("Motion to Compel") on July 9, 2021. Dkt. No. 47. In the motion, the Liquidator sought to compel responses to the first document requests respecting documents from GCIB (of which Thandi was President) and, for certain requests, documents from Thandi. Thandi filed a response in opposition on July 30, 2021. Dkt. No. 55. The Liquidator filed a reply on August 20, 2021. Dkt. No. 68.

On December 28, 2021, the Court issued an Opinion and Order Granting in Part and Denying in Part Plaintiff's Motion to Compel Discovery from Defendant Jasbir S. Thandi. Dkt. No. 86. The Court ordered Thandi to produce the responsive GCIB documents, as well as documents responsive to requests 1, 2, 25, 26, 29, 30, 39, 40, 41, 42, and 43 of the Liquidator's First Set of Document Requests within 30 days of the order. Order and Opinion at 14. The Order specifically recognized that Thandi has control of GCIB records and that he should be compelled to produce them. *Id.* at 7, 9. The deadline for production of documents under the Court's order was January 27, 2022. *Id.*

Thandi did not produce any documents. The Liquidator accordingly filed an application for a clerk's entry of default against Thandi on January 31, 2022 based on his failure to produce documents as per the Court's order. Dkt. No. 89. Thandi did not file a response to that application. After a status conference on February 28, 2022 (Dkt. No. 94), at which the process for seeking a default by a motion for sanctions was discussed, the Court denied the application for a clerk's entry of default. Dkt. No. 94.

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<sup>1</sup> The Liquidator also served a second set of document requests and interrogatories on Thandi on July 12, 2021 that encompassed GCIB documents. On August 27, 2021, after the motion to compel discussed below was fully briefed, Thandi responded and again asserted the Fifth Amendment privilege in response to every document request and every interrogatory. *See* Thandi's Response to Liquidator's Second Set of Document Requests, attached hereto as Exhibit A.

Thandi has not produced any documents as required by the Court's order. As explained by Thandi's counsel during the February 28, 2022 status conference, Thandi has consulted with two additional counsel regarding the Court's order. After that consultation, Thandi has decided not to produce documents as required by the Court's order.

### **ARGUMENT**

#### **DEFAULT SHOULD BE ENTERED AGAINST THANDI FOR FAILURE TO COMPLY WITH THE COURT'S ORDER TO PRODUCE DOCUMENTS.**

Thandi has failed to obey the Court's order to produce responsive GCIB documents as well as documents responsive to certain requests by January 27, 2022. Rule 37(b)(2)(A)(vi) provides that "[i]f a party...fails to obey an order to provide or permit discovery...the court where the action is pending may issue further just orders... [including] rendering a default judgment against a disobedient party". Fed. R. Civ. P. 37(b)(2)(A)(vi).

Here, the documents sought by the Liquidator are highly relevant and constitute direct evidence of Thandi's and GCIB's misconduct. The first set of document requests included statements, documents, and communications concerning Global Hawk's investment accounts; documents concerning communications with the Vermont Department of Regulation; documents concerning capital contributions made to Global Hawk; documents concerning certain checks and deposits to Global Hawk accounts; and documents concerning Global Hawk's bank account at Mechanic's Bank.<sup>2</sup> By refusing to produce the documents, particularly the bank statements and records concerning specific checks and transactions, Thandi has deprived the Liquidator of highly relevant evidence and delayed and increased the cost of this proceeding.

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<sup>2</sup> The second set of requests sought documents concerning the preparation and verification of Global Hawk's audited financial statements; documents concerning Global Hawk's investment accounts; documents concerning Global Hawk's bank accounts at Bridge Bank and Mechanic's Bank, including statements and transfers; and documents concerning capital contributions to Global Hawk.

Thandi's conduct throughout the discovery process has demonstrated that he has no intention of producing any responsive documents. His blanket objections to both sets of document requests as well as his disregard of the Court's order to produce documents respecting the first set of requests "form[] a pattern of 'prolonged and vexatious obstruction of discovery with respect to...highly relevant records...". *Southern New England Telephone Co. v. Global NAPs Inc.*, 624 F.3d 123, 148 (2d. Cir. 2010), quoting *Penthouse Int'l, Ltd. v. Playboy Enters., Inc.*, 663 F.2d 371, 388 (2d Cir. 1981).

Thandi's refusal to comply with the Court's order is deliberate and considered. As described above, Thandi's counsel has stated that Thandi has consulted with two other counsel and decided not to produce documents as ordered. Thandi understands that default is a potential consequence of not producing documents as required. Indeed, he was served with a copy of the Liquidator's application for a clerk's entry of default, but did not respond.

The Rule 37(b) sanction of default judgment is proper in these circumstances. Thandi has made it clear that he will not produce important documents in compliance with the Court's order. This is a conscious choice after consultation with counsel. Moreover, Thandi has conducted a litigation strategy to avoid production of GCIB documents by allowing that company (of which he is President and 100% owner, *see* Complaint ¶ 6; Answer ¶ 6) to default and seeking to defend the matter only personally. The Complaint was served on Thandi by delivery. Dkt. No. 8. When the Liquidator later attempted to serve the Complaint on GCIB by delivery to Thandi, delivery was refused. *See* Dkt. No. 9 at Ex. D (Declaration of Non-Service on Thandi). This required the Liquidator to obtain an order allowing alternative service (Dkt. No. 10) and make that service (Dkt. No. 11). Notwithstanding both the original and alternative service, Thandi allowed GCIB to default in this action. Dkt. No. 21.

This case presents an extreme situation in which the sanction of default is appropriate. *See Guggenheim Capital, LLC v. Birnbaum*, 722 F.3d 444, 450-51 (2d Cir. 2013) ("Certain Rule 37 remedies – dismissing a complaint or entering judgment against a defendant – are severe sanctions, but

they may be appropriate in ‘extreme situations,’ as ‘when a court finds willfulness, bad faith or any fault on the part of the’ noncompliant party.’”), quoting *Bobal v. Rensselaer Polytechnic Inst.*, 916 F.2d 759, 764 (2d Cir. 1990). Thandi’s disobedience of the Court’s order is deliberate and willful. And the strategy of allowing GCIB to default while litigating personally should not be countenanced. *See Southern New England Telephone Co.*, 624 F.3d at 149 (noting deterrence aspect of sanctions).

Thandi has willfully ignored the Court’s order to produce responsive documents and has made minimal effort to meaningfully participate in discovery. He has stated through counsel that he does not plan to produce documents as required by the Court’s order. The Court’s entry of default is an appropriate sanction. The Liquidator can then address damages.

### **CONCLUSION**

For the foregoing reasons, the Liquidator requests that the Court grant Plaintiff’s Motion for Sanctions (Default) and enter a default against defendant Jasbir S. Thandi.

Dated: March 9, 2022

Respectfully submitted,

MICHAEL S. PIECIAK, COMMISSIONER OF  
THE VERMONT DEPARTMENT OF  
FINANCIAL REGULATION, SOLELY AS  
LIQUIDATOR OF GLOBAL HAWK  
INSURANCE COMPANY RISK RETENTION  
GROUP,

By his attorneys,

\_\_\_\_\_/s/Jennifer Rood\_\_\_\_\_

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of March, 2022, a true and correct copy of the Liquidator's Memorandum of Law in Support of Motion for Sanctions was served by ECF on all counsel of record.

/s/Jennifer Rood\_\_\_\_\_

Jennifer Rood

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

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MICHAEL S. PIECIAK IN HIS OFFICIAL  
CAPACITY AS COMMISSIONER OF  
VERMONT DEPARTMENT OF  
FINANCIAL REGULATION AS  
LIQUIDATOR OF GLOBAL HAWK  
INSURANCE COMPANY RISK  
RETENTION GROUP

DOCKET NO. 2:20-CV-00173

Plaintiff,

v.

JASBIR S. THANDI, ET AL. ,

Defendants.

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**RESPONSE OF THE DEFENDANT, JASBIR S. THANDI, TO PLAINTIFF'S  
SECOND REQUEST FOR THE PRODUCTION OF DOCUMENTS**

Request No. 1

All documents concerning Global Hawk's Annual Statements submitted to the Vermont Department of Financial Regulation for the years 2017, 2018, and 2019.

Response No. 1

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 2

All documents concerning the preparation of Global Hawk's Annual Statements submitted to the Vermont Department of Financial Regulation for the years 2017, 2018, and 2019.

Response No. 2

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 3

All documents concerning the verification of Global Hawk's Annual Statements submitted to the Vermont Department of Financial Regulation for the years 2017, 2018, and 2019.

Response No. 3

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 4

All documents concerning Global Hawk's Audited Financial Statements for the years 2016, 2017, and 2018.

Response No. 4

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 5

All documents concerning the preparation of Global Hawk's Audited Financial Statements for the years 2016, 2017, and 2018.

Response No. 5

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 6

All documents concerning communications with Padda or QuantBridge concerning Global Hawk's Annual Statements for the years 2017, 2018, and 2019.

Response No. 6

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 7

All documents concerning communications with Padda or QuantBridge concerning Global Hawk's Audited Financial Statements for the years 2016, 2017, and 2018.

Response No. 7

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 8

All documents concerning the Global Hawk accounts.

Response No. 8

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 9

All documents concerning communications concerning the Global Hawk accounts.

Response No. 9

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 10

All documents concerning the accounts held by Global Hawk at Bridge Bank and Mechanics Bank.

Response No. 10

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 11

All documents concerning communications concerning the accounts held by Global Hawk at Bridge Bank and Mechanics Bank.

Response No. 11

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.



Request No. 12

All documents concerning communications with Stifel concerning the Global Hawk accounts.

Response No. 12

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 13

All documents concerning communications with Stifel concerning the Stifel SPA Loan accounts nos. \*\*\*7833 and \*\*\*1745.

Response No. 13

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 14

All documents concerning communications with AFF concerning the capital contributions to Global Hawk.

Response No. 14

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 15

All documents concerning communications concerning the capital contributions to Global Hawk.

Response No. 15

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 16

All statements concerning the Global Hawk accounts.

Response No. 16

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 17

All statements concerning the accounts held by Global Hawk at Mechanics Bank.

Response No. 17

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 18

All statements concerning the accounts held by Global Hawk at Mechanics Bank received from Mechanics Bank.

Response No. 18

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 19

All statements concerning the accounts held by Global Hawk at Mechanics Bank provided to the Captive Manager by GCIB.

Response No. 19

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 20

All statements concerning the accounts held by Global Hawk at Bridge Bank.

Response No. 20

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 21

All statements concerning the accounts held by Global Hawk at Bridge Bank received from Bridge Bank.

Response No. 21

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 22

All statements concerning the accounts held by Global Hawk at Bridge Bank provided to the Captive Manager by GCIB.

Response No. 22

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 23

All documents concerning transfers to or from Bridge Bank account no. \*\*\*0831 to Stifel account no. \*\*\*7240 for Grey's Investment Inc.

Response No. 23

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 24

All documents concerning transfers to or from Bridge Bank account no. \*\*\*0831 to Bridge Bank account no. \*\*\*7363.

Response No. 24

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 25

All documents concerning transfers to or from Stifel account no. \*\*\*0101 to Bridge Bank account no. \*\*\*4464 for Advent Fund Ltd.

Response No. 25

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 26

All documents concerning agreements of any kind between Global Hawk and GCIB.

Response No. 26

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 27

All documents concerning any amounts paid to GCIB by or on behalf of Global Hawk.

Response No. 27

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 28

All documents concerning any amounts paid to GCIB with respect to Global Hawk.

Response No. 28

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 29

A complete listing of policies issued by Global Hawk or in Global Hawk's name at any time after July 2016.

Response No. 29

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 30

All documents concerning policies with prefix codes "CALQ" and "NVLQ" at any time after July 2016.

Response No. 30

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 31

All documents concerning communications concerning policies with prefix codes "CALQ" and "NVLQ" at any time after July 2016.

Response No. 31

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 32

All records of premiums received by GCIB with regard to Global Hawk policies at any time after July 2016.

Response No. 32

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 33

All records of member capital contributions received by GCIB on Global Hawk policies at any time after July 2016.

Response No. 33

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 34

All documents concerning member capital contributions on all policies, including but not limited to renewal policies.

Response No. 34

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

Request No. 35

All documents concerning communications concerning member capital contributions on all policies, including but not limited to renewal policies.

Response No. 35

OBJECTION: The Defendant objects to responding to this document request on the grounds that it may violate his Fifth Amendment privilege, which he asserts in response to this document request.

THE DEFENDANT,  
JASBIR S. THANDI,

By His Attorneys,

*/s/ Brian A. Suslak*

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And

*/s/ Michael J. Racette*

---

Michael J. Racette, *Pro Hac Vice* MA Bar #55535  
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Boston, MA 02210  
Phone: 617-439-7500  
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Certificate of Service

I hereby certify that on this day, I caused a copy of the within document to be served upon all counsel of record, by electronic mail, on this 27th day of August 2021.

*/s/ Michael J. Racette*

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