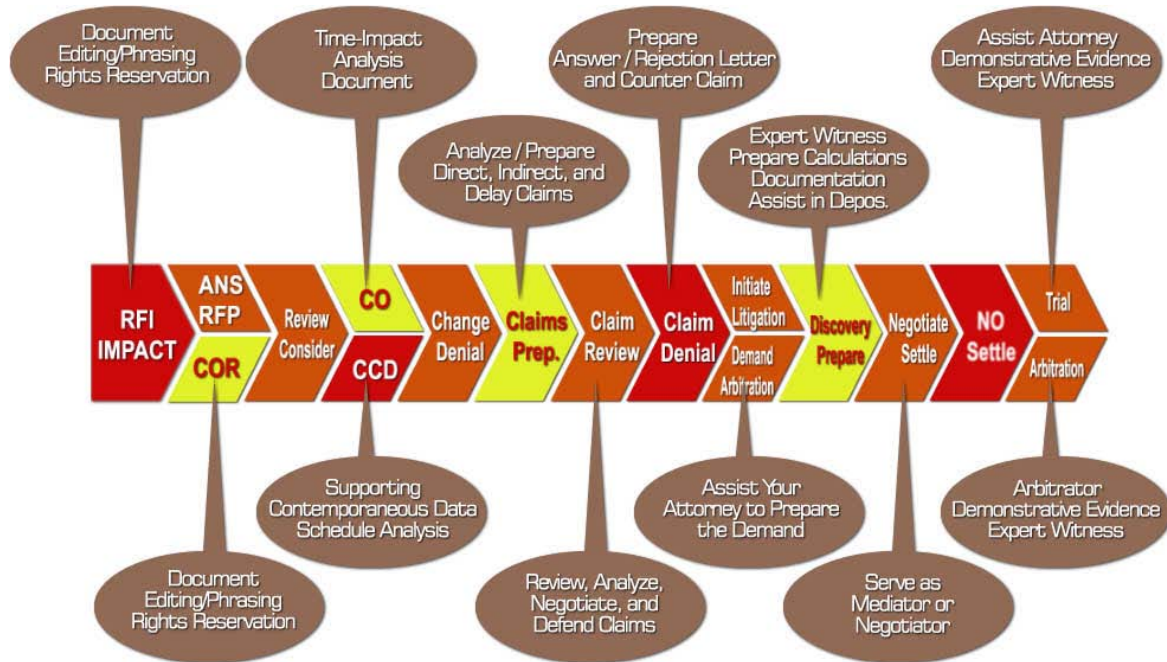


Construction Claims:



Major Construction Claims Experience:

As A Claims Consultant

Sacramento County Jail, Sacramento, CA (approximately 1-year) - \$19.9 Million

Claim filed by the Contractor, Bechtel Corporation, for direct and delay damages on \$75.7 million multi-story County Jail facility in the center of downtown Sacramento. Retained by the architectural firm of Helmut, Obata and Kassebaum (HOK), through CNA their Errors and Omissions Insurance carrier. My position was Senior Consultant. I directed all of the delay analysis, loss of productivity analysis and review of all the impacts and specific issues. There were over 3000 issues from RFIs and other documents to deal review and analyze. As as-built schedule was reconstructed from contemporaneous documentation and a But-For style analysis was made. All issues were read, considered, quantified and applied if deemed pertinent. Deposition, settled.

Seattle Convention Center, Seattle Washington (approximately 14 months) - \$27.8 Million

Claim filed by the Contractor, Paschen Contractors, Inc., for direct and delay damages recovery on a \$100 Million convention center project in downtown Seattle. Retained by the Owner and Architect. Was brought in from Phoenix to conduct the delay analysis as Senior Consultant. The claim consisted of over 6500 issues via RFIs and other forms of notification. All issues were reviewed and retained in the analysis if deemed pertinent and substantial. Deposition, settled.

Cabrillo Beach Marina, Port of Los Angeles (approximately 11 months) - \$3.7 Million

Claim filed by Crowley Constructors, Inc, for work performed as the water-side contractor on a new \$22 million boat harbor project. I conducted all fact-finding investigation, constructed an as-built schedule and performed a delay analysis, as well as a cost analysis and testified on the basis of our analyses. Retained by Crowley Maritime, Inc. Position was Senior Consultant.

Depositions, attended opposing depositions, settled by order of court. Total litigation had lasted over 5-years and cost over original contract amounts. I was brought-in late to try to help bring to conclusion.

Flagstaff High School, Flagstaff, AZ (approximately 4-5 months) - \$4 million

Claim levied by the Contractor, Sletten Construction, on the delays experienced during construction of a new high school. The client was Project Control, on behalf of the Flagstaff School District. Claim mostly dismissed, with small payment. Position Project Manager.

Harvey's Resort Hotel and Casino, Lake Tahoe, NV (approximately 8-months) - \$6 million

Assisted the Contractor, O & D Construction, research and develop its claim for the work they did on the interior construction/renovation of the hotel's casinos and restaurants. The claim was against the Contractor's architect in a Design-Build Contract for failure to perform and provide an efficient design. Their work product, far beyond the bid scope, caused delays and extra costs to the Contractor, O & D. Case settled just prior to arbitration hearing. Position was Project Manager. Deposition, settled.

Phoenix International Raceways, Phoenix, AZ (approximately 7-months) - \$750K

We were retained by the steel supplier/erector to develop a claim for delay and extra material cost damages. The steel erector, our client, withheld facts that surfaced under oath in depositions. The case settled, mostly in favor of the owner, due to lies told by our client. It shows that you must be totally open and truthful with your attorney and consultant. Settled.

Pima County Prison, Tucson, AZ (approximately 4-months) - \$600K

We were retained by the mechanical contractor to assert a delay and disruption claim. Case settled just prior to trial. Position was Project Manager. Deposition, settled.

Light Rail Project in Los Angeles, Ongoing Assignment over 1-1/2 years

I was part of the presenting team that won over other major claims firms, such as O'Brien Kretzberg, giving this work assignment to High Point Schaefer and allowing the opening of an LA office. I worked out of this office of approximately 1-1/2 years while developing analyses and rebuttals to contractor claims on two subway stations in downtown LA.

As Vision Consultants

Highschool, Joseph City, AZ

The City, through the high school hired Vision to review what they believed to be "shotty" work and incomplete or incorrect work performed by the general contractor, who refused to fix and/or complete the work. We evaluated the work and created detail reports that were then used to negotiate (mediate) with the contractor and finally reach a settlement. Estimated value was \$1.5 million. Settled.

Major New Toll Road, Orange County, CA through URS Consultants.

Provided delay analysis services to URS Engineers who were the Oversight group to Orange County on the \$870 million plus project to build 17-miles of new Toll Highway. The specific claim I was involved with was the Contractors, a large consortium, claim for delay damages due to an injunction involving a section of the project due to environmental reasons. This was an analysis of the merits of the Contractor's claim and an evaluation of concurrent delays that might have offset all or part of the Contractor's delay claim. It also involved the theory of the Contractor's Right to Early Completion. The Claim was finally settled. I worked on this claim off-and-on for about 13 months.

City of Phoenix Multiple-site Cross-Generation Recreational Facilities

I assisted Forcon Engineers to make a survey and assessment of the asserted deficiencies in the constructed project by Forcon's client, the general Contractor. I produced a book that evaluated and if possible rebutted the deficiencies asserted by the City of Phoenix. This book was used to negotiate away most of the claims, except for a few which were the contractor's fault. The plans used for construction were to a great part deficient and ambiguous. Settled.

I am currently preparing a claim for Yearout Mechanical in Albuquerque, NM

Department of the Navy – Trident Motor Storage Facility – Camp Navajo, Belmont, AZ

Lamb Engineering & Construction Co., out of Salt Lake City, UT sued the navy for both Delay issues and direct costs. I was hire by the Arizona USPFO to Analyze and defend the Navy against the Delay portion of the Lawsuit. The delay costs were the major part of Lamb's claim. Shortly after my analysis and report was delivered to Lamb's attorney (provided by the bonding company), Lamb's delay case in its entirety was dropped. This saved the navy further defense costs and exposure to Lamb's claim cost.

For My Employer

[City of Santa Fe, NM, Waste Water Treatment Plant](#)

Developed a claim headed for Federal Court based on improper fabrication of major process concrete and epoxy-lined piping, that caused major delays and disruption to the construction of this plant. It also involved improper specifications and review of shop drawings. I acted as both a percipient and expert witness. Supplier went into bankruptcy during litigation. Finally settled for about \$2 million plus removal of previously charged liquidated damages. I was Project Manager, having taken over for prior PM who was removed. The collection and analysis of evidence became part of a highly technical and forensic investigation.

[City of Durango, CO, Waste Water Treatment Plant](#)

I assisted the PM and others to develop a large delay and direct cost claim against the City of Durango. It was settled in our favor. Amount unknown.

As An Independent

[Fossil Fuel Power Plant, Mechanical Piping, Grants, NM](#)

I was hired by the supplier and installer of basalt-lined pipe through their attorney in Albuquerque to act as an expert witness to the fact that they supplied and performed the job within industry standards and did not participate in the delays of the project. I did the analysis, was deposed and testified in Federal Court. Decision was almost a 50-50 split decision by the Judge.

This is a Partial List.