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8 Attorneys for Defendant McLARAND, VASQUEZ & PARTNERS, INC.
9 (erroneously sued herein as MCLARLAND, VARQUEZ & PARTNERS, INC.)

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA —DOWNTOWN DISTRICT

10 CILKER APARTMENTS, LLC,) **CASE NO. 1-13-CV-258281 Complex**
11) *[Assigned to Hon. Peter H. Kirwan; Dept. 1]*
12 Plaintiffs,)
13 vs.) **McLARAND, VASQUEZ & PARTNERS,**
14) **INC.’S SUPPLEMENTAL EXPERT WITNESS**
15) **DESIGNATION**

16 WESTERN NATIONAL CONSTRUCTION,)
17 MCLARLAND, VARQUEZ & PARTNERS,)
18 INC., GROUP M ENGINEERS, GENTRY)
19 ASSOCIATES CONSTRUCTION)
20 CONSULTANTS, LARCO INDUSTRIES,)
21 FITCH PLASTERING, COURTNEY)
22 WATERPROOFING, CELL CRETE, LOS)
23 NIETOS CONSTRUCTION, MADERA)
24 FRAMING, KELLY DOOR, TARA)
25 COATNGS, LDI, ADM PAINTING,)
26 ALLIANCE BUILDING PRODUCT, JOS. J.)
27 ALBANESE, ANDERSON TRUSS,)
28 CALIFORNIA CLASSIC PAVERS, CASEY-))
FOGIL CONCRETE CONTRACTORS,)
CENTRAL COAST STAIRS,)
COMMERCIAL ROOF MANAGEMENT,)
DAVEY ROOFING, INC., DEMETRIS)
PAINTING II, INC., DOORWAY MFG.,)
LANDSCAPE PROS, MULTI-BUILDING)
STRUCTURES, PARK WEST, PYRAMID)
BUILDERS, ROBECKS WELDING &)
FABRICATION, RYLOCK COMPANY,)
SUMMIT WINDOW & PATIO DOOR,)
VANGUARD and DOES 1-100, inclusive,)
Defendants.)

Complaint Filed: 12/26/13
FAC Filed: 03/20/14
Trial Date: 02/01/16

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WESTERN NATIONAL CONSTRUCTION,)
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Cross-Complainant,)
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vs.)
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ROES 1 – 500, inclusive,)
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Cross-Defendants.)
)

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, in accordance with Case Management Order in this action, Defendant McLARAND VASQUEZ & PARTNERS, INC. (“MVP”) hereby designates the following additional retained expert witnesses who may testify at the trial of this matter:

- 1. Karim P. Allana, PE, RRC, RWC; Allana Buick & Bers, 990 Commercial Street, Palo Alto, California 94303
- 2. Christiana Drake, Ph.D.; UC Davis, One Shields Avenue, 4240 Mathematical Sciences Building, Davis, California 95616

MVP reserves the right to retain and call any and all other expert witnesses designated by any other party to this action, which need may arise after the deposition testimony of various experts involved herein have been obtained, should the same become necessary.

Discovery in this matter is on-going and MVP reserves the right to amend and supplement this designation if it is determined that additional expert testimony is required, and further specifically reserves the right to call additional, supplemental, and rebuttal experts in accordance with the California *Code of Civil Procedure*.

MVP also reserves the right to submit the names of additional expert witnesses upon receipt of the exchanges of other parties.

MVP also reserves the right to call at trial any expert witness regardless of whether the expert witness has been previously designated by any other party, to impeach the testimony of any

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expert witness offered by any other party at trial in accordance with *Code of Civil Procedure* section 2034.210, et seq.

If any of the witnesses discussed and/or identified herein are not available at the time of trial, MVP advises all parties that it will seek introduction of competent former testimony, including depositions of such witnesses, in lieu of their live testimony. MVP also reserves the right to substitute experts if the schedule of trial or other circumstances preclude their testimony at trial.

The above listed expert witnesses have agreed to testify at trial and will be sufficiently familiar with the pending action to submit to a meaningful deposition.

DATED: November 25, 2015

COLLINS COLLINS MUIR + STEWART LLP

By: 
STEPHEN B. LITCHFIELD
SAMUEL J. MUIR
Attorneys for McLARAND VASQUEZ &
PARTNERS, INC.

DECLARATION OF STEPHEN B. LITCHFIELD

I, STEPHEN B. LITCHFIELD, declare as follows:

1. I am an attorney duly licensed to practice before the Courts in the State of California. I am an Associate in the Law Firm of Collins Collins Muir + Stewart LLP, attorneys of record for McLARAND VASQUEZ & PARTNERS, INC. (“MVP”);

2. As to Karim P. Allana, PE, RRC, RWC, I am informed and believe the following:

a. Mr. Allana is a principal with Allana Buick & Bers, 990 Commercial Street, Palo Alto, California 94303. A copy of Mr. Allana’s curriculum vitae is attached hereto as Exhibit “A.” Mr. Allana has agreed to testify at trial.

b. Mr. Allana is a licensed Professional Engineer in the State of California. Mr. Allana is a registered Roof Consultant and a registered Waterproofing Consultant. Mr. Allana’s experience in the design and construction industry spans more than 30 years and includes experience specializing in forensic analysis, roofing and waterproofing of structures, construction management, and development of construction drawings for new construction and remedial projects.

c. Mr. Allana will testify as to the architect’s role on the project, standard of care, contracts, scope of work, contract documents (including plans and specifications), documents prepared by MVP, constructability of design drawings, causation of damages, materials, applicable codes, standards and construction issues, damages, delays, and the cost of repair. He will also respond to the contentions and opinions of any and all other relevant witnesses called by other Defendants/Cross-Defendants and/or Plaintiff. Mr. Allana has agreed to testify and will be sufficiently familiar with the pending action to submit to a meaningful oral deposition.

d. Mr. Allana's fee for deposition testimony is \$525 per hour for any part thereof.

Mr. Allana will be sufficiently familiar with the pending action to submit to a meaningful oral deposition concerning the testimony described above, including his expert opinions and the basis therefore, upon notice given in compliance with the *Code of Civil Procedure* and Case Management Order in this action.

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3. As to Christiana Drake, Ph.D., I am informed and believe the following:

a. Dr. Drake is a professor at UC Davis in Davis California. A copy of Dr. Drake's curriculum vitae is attached hereto as Exhibit "B." Dr. Drake has agreed to testify at trial.

b. Dr. Drake will testify on all issues of standard of care, liability, causation, damages, allocation, repairs for the alleged defects and damages to the property at issue, with a focus on statistical assessment and extrapolation.

c. Dr. Drake will be sufficiently familiar with the pending action to submit to a meaningful oral deposition concerning the testimony described above, including her expert opinions and the basis therefore, upon notice given in compliance with the *Code of Civil Procedure* and Case Management Order in this action.

Dr. Drake's fee for providing deposition testimony is \$550 per hour.

4. MVP reserves the right to take the deposition of, and call at trial, any expert disclosed by the parties to this lawsuit, and further reserves the right to call any additional witnesses not named in this Supplemental Disclosure in response to experts disclosed by any party to this action for the purposes of rebutting said experts.

5. MVP further reserves the right to call its client experts pursuant to the provisions of CACI § 600.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 30th day of October 2015 at Oakland, California.

Executed on this 25th day of November 2015, at Oakland, California.

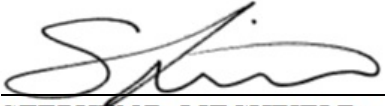

STEPHEN B. LITCHFIELD
Declarant

EXHIBIT “A”



KARIM ALLANA, PE, RRC, RWC

President / Senior Principal

Mr. Allana has been in the construction field for over 35 years, specializing in forensic analysis of construction and sustainable design of building envelope systems, roofing and waterproofing construction, and construction management. For the past 27 years, Mr. Allana has been the president and chief technical expert/engineer of Allana Buick & Bers (formerly Allana-Lippert) an architectural and engineering firm that specializes in sustainable design of new construction as well as repair of old buildings. As the Principal-In-Charge, Mr. Allana has performed over 3,400 architectural and engineering projects, in California, Nevada, Washington and Hawaii, for all types of building structures.

Allana Buick & Bers has about 95 employees and covers the engineering disciplines of civil, mechanical and architectural fields. Clients include multi-family residential, federal and local government, commercial, industrial, schools, colleges and universities, insurance companies and healthcare facilities. Allana Buick & Bers projects have included forensic assistance with expert witness type work; review of standard of care and industry standards; major building envelope renovation; due diligence studies; architectural peer review for new construction projects; construction administration and monitoring; testing and evaluation of construction materials; and review of design standards for material manufacturers.

Education

Santa Clara University, Santa Clara, California

- B.S., Civil Engineering

Registration

PE, Civil Engineering:

- California
- Hawaii
- Washington
- Nevada
- Oregon

Licenses

General Building Contractors:

- California
- Hawaii
- Nevada

Certifications

- Registered Roof Consultant (RRC), Roof Consultants Institute (RCI)
- Registered Waterproofing Consultant (RWC), Roof Consultants Institute (RCI)
- Radiation Safety Officer Training for Nuclear Testing Devices

Professional Societies and Affiliations

- National Trust for Historic Preservation
- The Association for Preservation Technology International
- California Association of Community Managers (CACM)
- Coalition for Adequate School Housing (CASH)
- Construction Specifications Institute (CSI)
- Executive Council of Homeowners (ECHO)
- International Facility Management Association (IFMA)
- Roof Consultants Institute (RCI)
- Sealant, Waterproofing and Restoration Institute (SWRI)
- Western Construction Consultants Association (WESTCON)
- American Solar Energy Society (ASES)
- American Architectural Manufacturers Association (AAMA)

Representative Experience

- With ABBAE Since: 1987
- With Other Firms: 8 years

Affiliations and Membership

Mr. Allana is a member of National Trust for Historic Preservation, The Association for Preservation Technology International, Roof Consultants Institute (RCI), American Wall and Ceiling Institute (AWCI), Executive Council of Homeowners (ECHO), California Association of Community Managers (CACM), Coalition for Adequate School Housing (CASH), American Architectural

Manufactures Association (AAMA), Community Association Institute (CAI), International Facility Management Association (IFMA), Western Construction Consultants Association (WESTCON), and the American Solar Energy Society (ASES). Allana Buick & Bers is affiliated with the Construction Specifications Institute (CSI).

Education and Registration

A graduate of Santa Clara University in Civil Engineering, Mr. Allana obtained his California Professional Civil Engineering (P.E.) registration in 1987, Nevada registration in 2002, Hawaii registration in 2005, Oregon registration in 2009 and Washington registration in 2010. Mr. Allana is a registered Roof Consultant (RRC) and a Registered Waterproofing Consultant (RWC) as granted by Roof Consultants Institute (RCI). Mr. Allana is a licensed general Building Contractor in California, Hawaii and Nevada.

Mr. Allana actively attends numerous seminars on subjects including building envelope technology, siding, building integration for solar PV, mold remediation, roofing, concrete, exterior insulation and finish systems (EIFS), cement plaster, masonry, litigation, communication, and other fields.

Mr. Allana also has extensive teaching experience as a lecturer for UC Berkeley in the field of building envelope construction and has been a speaker at dozens of seminars in California, Nevada, Hawaii, Washington, Florida and Arizona. Mr. Allana has also been part of the RCI faculty and has conducted training classes for General Contractors.

Work Experience

After graduation from college, Mr. Allana worked for Turner Construction Company for a period of 2.5 years as an engineer and superintendent. For Turner Construction, Mr. Allana managed over \$75 million in construction contracts. During college and after Turner Construction, Mr. Allana worked for Precision Roofing, a commercial roofing and waterproofing company, as a superintendent and operations manager. In 1992, along with three partners, Mr. Allana formed the roofing company Waterproofing Associates, and served as a member of the Board of Directors for five years before selling his shares.

Since January 1987, Mr. Allana has been the Chief Executive Officer and Principal Consultant of Allana Buick & Bers (www.abbae.com), formerly Allana-Lippert and Roofing Services & Consultants, where he has been responsible for planning and administration of the company as well as providing technical standards for the building technology group. He serves as principal consultant in forensic investigations of building assemblies and failure analysis. His field of expertise includes all aspects of general construction, with specialization in building envelope components such as roofing, siding, flooring, precast concrete units, glass fiber reinforced cement units, EIFS, cement plaster, wood rot, window assemblies, storefronts, curtain wall, below grade waterproofing, architectural sheet metal, plaza deck applications, traffic bearing coatings, mechanical room waterproofing, concrete restoration, building sealants, and other building envelope components.

Construction Defect Litigation Experience

Mr. Allana has acted as a consultant or expert witness in over 200 construction defect projects as a lead plaintiff expert, lead defense expert, consultant, expert, or in defense of sub-contractors and manufacturers. As a consultant and expert witness, Mr. Allana has worked with many attorneys and has represented all types of clients on a wide range of projects including homeowner associations, REIT's, government agencies, industrial and commercial companies, single family homeowners, and educational institutions.

Mr. Allana's experience includes forensic analysis of construction defects, analysis of as-built conditions, as-built surveys and as-built drawings, preparing remedial design for corrective or restorative work, preparation of remedial construction documents for repairs scheme and claim estimates, alternate design and repair methods for negotiation and settlement, preparing budgets and cost estimates, deposition and mediation conferences.

For forensic and litigation projects, Mr. Allana has served as a lead expert on many aspects of building envelope construction including most types of roofing systems including built up roofing, modified bitumen roofing, metal roofing, shakes, tile, fiber cement roofing, single ply roofing, green roofs, polyurethane foam roofing, and other fluid applied roofing systems. Other areas of building construction litigation includes EIFS, cement plaster, storefronts and windows, metal panels, masonry, hardboard siding, pre-cast and formed concrete, masonry, metal panels, windows, doors, storefronts and curtain wall systems, flooring, ceramic tile, stone veneer assembly, dimension stone, and general construction. Mr. Allana's litigation experience has included, single and multi-family residential buildings as well as office buildings, commercial and industrial type buildings.

Mr. Allana's involvement with the projects has included forensic investigation, water testing and destructive testing of assemblies, outside laboratory services including various ASTM testing methods, air and water infiltration testing, mold investigation, and chemical analysis. In conjunction with litigation projects, Mr. Allana has also assisted with preparation of construction documents, obtaining construction estimates, bidding and procurement of construction work. Mr. Allana has also acted as an expert and mediator to resolve disputes between parties, analyzing claims, and change orders.

Attorneys in this field include:

Plastiras & Terrizzi; Miller, Morton, Caillat & Nevis, LLP; Fenton Grant Mayfield Kaneda & Litt LLP; Mitchell & Schroeder; Stanton, Kay and Watson, LLP; Tarkington, O'Neill, Barrack & Chong; Allen Matkins Leck Gamble Mallory LLP; Cannistraci Law Firm; Elliott & Elliott; Gary Au Young, Attorney at Law; Law Offices of Lance Castoverde; Law Offices of Uzzell Branson; Orrick, Herrington & Sutcliffe LLP; Burnham Brown; Law Offices of Robert P. Kahn; Low Ball & Lynch; Greene Radovsky Maloney & Share LLP; Angius & Terry LLP; Berding & Weil LLP; Pahl & McCay; and others.

Construction Defect Litigation Projects: Multi-Family and Private Residential

- **900 Green Street, San Francisco, California:** EIFS, windows, and balcony defects and damages to a 12 unit luxury condominium project.
- **1438 Green Street, San Francisco, California:** ABBAE was retained on behalf of The Arundel HOA to perform forensic investigation of leaking planters and to survey the patio traffic bearing coating. Building components that were investigated included: EIFS system, sealants, low slope BUR roof, planters, skylight curb flashings, internal gutters, and electrical wiring. ABBAE provided a findings report and remedial/repair recommendations.
- **Aria HOA, San Diego, California:** Provided forensic litigation services for a 24 stories building.
- **Alta HOA, San Diego, California:** Provided forensic litigation services for a 21 stories building.
- **Banning Villa Apartments, Wilmington, California:** Roof condition assessment for a 90 unit apartment property. Prepared summary report of findings along with life cycle cost analysis for repair and replacement options.
- **Bay Landing Apartments, Walnut Creek, California:** Roof, balcony and patio deck leak investigation for a 360 unit apartment property. Provide repair recommendations, cost estimate for restoration, plans and specifications for shingle replacement, and litigation assistance for water intrusion occurring in roof system, exterior balcony decks, and exterior corridors.
- **Boca Raton Condominiums, Las Vegas, Nevada:** ABBAE was retained to provide Forensic Investigation and Water Testing services.
- **California Regatta Community, American Canyon, California:** Investigation of design and construction defects for over 20 homes within a subdivision. Destructive and non-destructive testing, preparation of report, depositions, and expert witness testimony.
- **Cascade Canyon Condominiums, Fairfax, California:** Litigation assistance for construction defects.
- **Cherry Orchard Apartments:** Provided investigation for elevated private decks and walkways and associated components, stair tower landings, podium private decks, podium common areas, planters. Provided repair drawings for emergency deck repairs. Life Safety: Performed a due diligence survey of the exterior to identify areas that exhibited signs of water intrusion. Evaluated condition of exposed framing and designed shoring. Produced repair drawings for the entire complex.
- **Costa Residence, Monte Sereno, California:** ABBAE provide forensic investigation and destructive testing services for this single family residence that was experiencing below-grade water intrusion into the basement and leaks through the stucco. Investigation included mechanical room, stairwell, pavers, windows and door observation. The residence was 9,339 square feet and the guest house was approximately 700 sqft. ABBAE provided owner with remedial repair recommendations report.
- **Crain Family, Los Gatos California:** Peer design review of waterproofing exterior decks at a private family residence located in Los Gatos, California.
- **Diller Family Trust, Woodside, California:** Leak investigation of standing-seam and flat sheet copper roofing, store-front glazing, wall treatment, doors and thresholds for a custom built home located in Woodside, California. Analysis of the building envelope to determine whether the design and construction was carried out according to industry standards. Also investigated the cause and extent of flood damage in the basement crawlspace.
- **Efron Townhouses, Menlo Park, California:** Prepare plans and specifications for deck waterproofing, framing renovation and associated contract administration services for townhouse properties. Also provided litigation assistance.
- **Eucalyptus Knoll, Mill Valley, California:** Waterproofing for a 35 unit townhouse development. Litigation assistance for roof deficiencies.
- **Fillmore Center, San Francisco, California:** Provide investigation, preliminary design, budgets, design options, plans and specifications and litigation support for defect remediation for a 1,114 unit, multi-story, multi-family apartment home.
- **Flohr Residence, San Jose, California:** ABBAE was retained to perform forensic investigation for code violations on a residential property located in San Jose.
- **Fountains at River Oaks, San Jose, California:** Structural and building envelope evaluation of a 226 apartment property. Evaluated rot and waterproofing damage associated with decks and landings. Prepared design and construction documents for remedial repairs.
- **Foxboro Villages, Pleasant Hill, California:** Litigation assistance for roof deficiencies.
- **Gluz Residence, Atherton, California:** Evaluate conditions and provided litigation assistance of building envelope components at a private residence.
- **Goldman Residence, Los Altos Hills, California:** Investigation and analysis for remedial repair solutions of building envelope and construction defects at a \$30 million residential property.
- **Hamptons Apartments:** Provided investigation for elevated private decks and walkways and associated

components, stair tower landings. Provided repair drawings for emergency deck and stair tower landings. Performed a due diligence survey of the exterior to identify areas that exhibited signs of water intrusion. Evaluated condition of exposed framing and designed shoring. Produced repair drawings for the entire complex.

- **Harry J. Berberich & Company, Garden Valley, California:** Investigation and analysis of a torch applied modified bitumen roofing system for Berberich residence located in Garden Valley, California.
- **Jeff Luney Residence, Belmont, California:** Evaluation and assessment of water intrusion occurring in the basement of the Luney residence.
- **Lick Mill Creek Apartments, San Jose, California:** Roof construction defect litigation for an 800 plus unit apartment property.
- **Luna Di Lusso, Las Vegas, Nevada:** ABBAE scope of services included water testing, destructive testing, building evaluation, leak investigations, study of plaintiffs/defendants reports, research, preparation of reports, depositions, expert witness testimony and related services.
- **Kim Residence** - Performed visual assessment of the building envelope, windows, doors, balconies, and associated assemblies for deficiencies that may have occurred during the original construction.
- **Marin Lagoon Homeowners Association, San Rafael, California:** Litigation assistance. Provide guide specifications for repair of shingle roofs for single family homes.
- **Marina Village Homeowners Association, Alameda, California:** Litigation assistance.
- **Nathan Family, San Francisco, California:** Evaluation and assessment of reconstruction for a 5,000 square foot private residence.
- **Orchard Glen Apartments, Santa Clara, California:** Forensic leak investigation and analysis of shingle roof system for a multi-story, 340 unit apartment property. Provide repair recommendations and assist in defining culpability.
- **Park Place Apartments, Mountain View, California:** Investigate distressed hardboard siding for a 377 unit apartment property. Provide recommendations for repair and expert witness testimony for construction defects.
- **Pfeiffer Family, Los Gatos, California:** Leak investigation of decks for a private residence located in Los Gatos, California.
- **Pinnacle Galleria, Roseville, California:** Leak investigation. Evaluated the condition of the exterior one coat stucco, balcony and breezeway waterproofing, tile roofing and gutters, assist in defining culpability, and recommended remedial repairs for a 236 unit apartment property.
- **Platinum, Las Vegas, Nevada:** Provided forensic litigation services for a 17 stories building.
- **Ryland Mews Homeowners Association, San Jose, California:** Extensive review, investigation and redesign of plaza, patio and building exterior waterproofing for multi-level (three stories over podium) 131 unit condominium complex.
- **Scheibel Residence:** Performed visual inspections of the exterior stucco and surveyed the exposed framing in the crawl space areas.
- **Shelbourne at Windermere Homeowners Association, Danville, California:** ABBAE was retained to conduct forensic investigation including water testing and limited destructive testing for the 25 building residential complex consisting of 142 units. The following building envelope systems were tested or surveyed for defect and building code violations: stucco, fiber cement siding, concrete tile roof, windows, doors, plumbing and mechanical systems, decks, and fire-resistive systems. ABBAE's work included investigation and findings report with preliminary repair scope.
- **Sky Condominiums, Las Vegas, Nevada:** Provided forensic litigation services for a 45 stories building.
- **South City Lights Homeowners Association, South San Francisco, California:** ABBAE was retained to provide forensic investigation, limited destructive testing and water testing for this four story residential community built over a podium slab with two levels of garage below. The complex has a total of six buildings with 290 total units and common areas. Our investigation included exterior stucco systems, below-grade waterproofing systems, structural concrete cracking in the garage, and leaking window systems. ABBAE's included investigation and findings reports with preliminary scope.
- **Stonefield Condominium Homeowners Association, Santa Rosa, California:** Construction defect litigation assistance; lead defense expert.
- **The Gables Homeowners Association, Pleasanton, California:** Litigation assistance for construction defects.
- **The Laurels at North Park, San Jose, California:** Provided investigation of the podium expansion joint, pool planters & pool deck and podium expansion joint repairs.
- **The Oaks at North Park, San Jose, California:** Performed forensic investigation of private decks, exterior breezeways and courtyards for a 266 unit

apartment complex. ABBAE scope included expert witness testimony, repair design, bidding and construction administration services.

- **The Palms at Waikiki, Honolulu, Hawaii:** Leak surveys and investigation, analysis, preparation of design documents, preparation of long term capital budget, construction period services, building permit application for replacement of roofing and infrastructure for a 12 story concrete condominium hotel.
- **The Pines at North Park, San Jose, California:** Provided investigation services for podium private deck, Podium drains, Podium expansion joints, Elevated private decks and elevated walkways, Gutters, Windows, Stucco, Planters. Provided repair drawings for emergency deck repairs when uncovered during the investigation.
- **Tradewinds Terrace, San Jose, California:** Detailed forensic investigation, evaluation and recommendations for repairs to siding, balcony decks, stairs and roofs of a 300 unit homeowners association. Provided design services and construction management services for replacement of siding, roofs and windows.
- **Washington Manor Homeowners Association, San Leandro, California:** Roof related litigation.
- **West Ocean, Long Beach, California:** The building comprised of 2 towers - 30 stories and 22 stories. ABBAE provided forensic litigation services.

Construction Defect Litigation Projects:

Educational

- **Del Mar High School, Campbell, California:** Investigate claim regarding a building addition. Studied plaintiff/defendant reports, reviewed construction documents, shop drawings, change orders, work stoppage, termination notices, and other correspondences related to the addition.
- **Foothill-De Anza Community College District, Los Altos, California:** Ascertain roof repair work completed by California Roofing at the "B" building located on the De Anza College campus.
- **Joan MacQueen Middle School, Alpine, California:** Visual investigation, water testing, destructive testing, building evaluation, leak investigation, study of plaintiffs/defendants reports, preparation of reports, depositions, and expert witness testimony for building envelope leaks.
- **Roosevelt Elementary School, Klamath Falls, Oregon:** Investigate insurance claim for damage to tile roofing system.
- **Watershed Sciences Building, UC Davis:** ABBAE was retained to provide forensic investigation for a two

story commercial building of approximately 45000 sqft, single ply low slope roof, storefront and inset windows and stucco exterior. The building had window leaks, extensive map cracking and what appeared to be large cracks from structural issues. After conducting full forensic review with DTs, spray rack testing and negative air testing, ABBAE supported the University in mediation negotiations as expert witness. ABBAE provided repair construction drawings and bid specifications and conducted bidding and negotiation for remedial construction.

- **Mission Bay Community Center, UCSF Mission Bay Campus, San Francisco, California:** Performed design, construction documents and construction administration services for the roof system, exterior wall system and waterproofing of the building. We also performed construction monitoring of the roofing and EIFS system.
- **Mondavi Center for the Performing Arts - University of California Davis, Davis, California.** Performed water testing and destructive testing of the stone veneer assembly, curtain wall windows, single ply roofing and aluminum panelized cladding to determine failure sources. Researched manufacturer specifications and material requirements. Constructed stone veneer proof of concept mock-up to evaluate proposed defense repair solutions. Created repair designs for all building assemblies and penetrations. Solicited independent repair pricing for multiple design solutions. ABBAE served as plaintiff expert witness and lead mediation meetings with 12 defense experts and legal counsel to resolve defects.
- **Veterinary Medical Laboratory Facility, UC Davis, California:** Provided forensic leak investigation services for the Veterinary Medical Laboratory Facility (VMLF). The VMLF is a single story steel-frame building that contains teaching laboratories, lecture halls and offices for veterinary medicine. The exterior is clad in stucco and CMU and there is a standing steep metal roof and low-slope roof with single ply membrane. The building was originally completed in 2002 and sustained roof and wall leaks upon completion. ABBAE began working with UCD and the original contractor on the project to determine the cause of the leak and develop remedial solutions to repair and correct the issues.

Construction Defect Litigation Projects: Commercial, Industrial and Hospitality

- **131 Stewart Street, San Francisco, California:** Evaluation of mechanical units and leak investigation for a commercial property. Provided litigation assistance.
- **1431 El Camino Real, Palo Alto:** ABBAE was retained to provide forensic investigation and litigation support

services on behalf of a concrete contractor for a mixed-use building. The build consisted of wood frame and concrete with a cast-in-place underground parking structure located in Palo Alto, California. ABBAE performed investigation services on the alleged concrete construction defects and provided expert witness testimony.

- **1450 Young Street, Honolulu, Hawaii:** Forensic investigation of existing built up roof (BUR), associated flashings, and construction components above the roof line for a 28 story concrete mixed use property. Prepared cost estimates for repair.
- **1503 Grant Road, Mountain View, California:** Field observations, water testing and destructive testing to determine the source of the leak areas for a two-story commercial property with a centrally-pitched roof containing a sloped glass skylight over an enclosed central atrium.
- **5050 Hopyard, Pleasanton, California:** Conducted finite element analyses of EIFS assembly for a four story, metal framed commercial building. Generated design documents and specifications for structural support systems for EIFS façade.
- **Brittania Limited Partners, South San Francisco, California:** Performed leak testing, forensic investigation, reporting, remedial repair development, and construction review for existing EIFS wall assemblies and related roof and window assemblies for various commercial building.
- **Chevy's Fresh Mex Restaurant, Tracy, California:** Litigation consulting and expert witness testimony for construction dispute.
- **Continental Sales, Watsonville, California:** Provided leak investigation, remedial design and construction phase services for a three story steel frame building with a storefront window system and stucco-clad exterior. Our investigate scope included: Building Envelope, HVAC Systems, Stucco cladding at the exterior walls, Storefront window systems, Curtain wall assemblies, Parapet coping, Rooftop air handling units, Interior VAV units, Associated accessories, piping and sealants.
- **Crocker's Lockers, South San Francisco, California:** Forensic investigation of building envelope system at a locker facility.
- **Eternit, Inc., Reading, Pennsylvania:** Evaluation of cement fiber reinforced panel, forensic investigation, study of plaintiff reports, research, destructive and non-destructive testing, preparation of reports, depositions and expert witness testimony for a claim.
- **Embassy Suites Hotel - Sacramento, California:** Eight story, 248 room, full service hotel with underground parking, completed in April 2002. Client reported water intrusion through multiple locations, ceiling cracks, soil settling and interior damage. ABBAE performed water testing and destructive testing of EIFS coating, window assemblies, exterior planters and below grade waterproofing to determine failure sources. Researched manufacturer specifications and material requirements. Created repair designs for all building assemblies and penetrations. Solicited independent repair pricing for multiple design solutions. Assisted in deposition research, and served as plaintiff expert witness.
- **Hampton Inn, Boise, Idaho:** ABBAE was retained to provide forensic investigation and litigation support for a hotel located in Idaho. The building exterior envelope consisted of windows, precast stone, EIFS and brick. ABBAE assisted with determining if the EIFS and sealants were designed and constructed properly.
- **Hilton Hotels, Honolulu, Hawaii:** Expert witness for civil case involving sealants and EIFS system.
- **International Gaming Technologies (IGT) ABBAE** was retained to provide construction defect consulting for a new construction system failure. The building was IGT's new Las Vegas office and manufacturing building. ABBAE was hired to perform forensic investigation and destructive testing to determine causation for the exterior tile façade falling off. ABBAE's scope included oversight of the contractor during the repair construction.
- **MetLife – 600 Spreckles Avenue, Manteca:** ABBAE conducted forensic investigation on the 600 Spreckles Avenue facility, a 550,000 SF distribution warehouse. The existing roof was a cap sheet with 2 plies underneath that has excessive splitting. ABBAE's scope of work consisted of determining if the roofing problem causation was from a defect during the original construction and proposed remedial/replacement options.
- **Orinda Theater Square, Orinda, California:** Construction defect litigation assistance.
- **Pacific Athletic Club, Redwood City, California:** Forensic analysis and testing of exterior EIFS cladding and the standing seam roof at the club. Investigate causes of water intrusion and assist with remedial solutions, construction details and specifications.
- **Qualcomm Real Estate & Facilities:** Provided forensic investigation, destructive testing and litigation support services for commercial property roofs and skylight in San Diego, California. Multiple buildings had damaged roofs due to moisture build up. Scope included findings reports and remedial recommendations.
- **Ralphs Supermarket, La Jolla, California:** Performed a detailed forensic investigation by conducting visual reviews, water and destructive testing. The data was

compiled and a detailed report was provided to the client. Provided design solutions to address the leaks and assisted Ralph's during the store remodel to incorporate waterproofing materials and details to fix the existing problems.

- **San Francisco Examiner, San Francisco, California:** Construction defect litigation assistance regarding the San Francisco Examiner headquarters building.
- **San Jose City Hall:** ABBAE was retained to provide forensic investigation, water testing, and destructive testing for below-grade water intrusion. The building is an 18-story office tower. Leaks were being reported at the concrete ceiling in the parking structure which is below the podium slab. Below grade wall leaks were reported at the exterior cast-in place concrete walls. Leaks were also reported at the floor line in mechanical rooms at the west elevation of the building.
- **Scripps Memorial Hospital, San Diego, California:** Insurance claim issues for the McDonald Center. Evaluation of building envelope moisture and water intrusion, including review of building leaks and damage. Performed evaluation study and reviewed conditions. Prepared report mitigation needs and resolution.
- **Space Systems/Loral, Palo Alto, California:** Comprehensive investigation and evaluation of ceramic tiles on the exterior face of one of the company's commercial building. Provide repair recommendations, budget report, along with plans and specifications for remedial work.
- **Sunnyvale Towne Center, Sunnyvale, California:** Building envelope evaluation of issues with newly finished office building and parking structure, including extensive review of water intrusion and moisture issues in traffic membrane, parking area waterproofing, and waterproofing of landscape planters for four-level below grade parking structure. Building leak detection surveys and forensic investigation of construction defects for three buildings of five and six stories.
- **The Galleria Imperial Plaza, Honolulu, Hawaii:** The Galerie Building of the Imperial Plaza is a residential and commercial complex located in Honolulu, Hawaii. Fireman's Fund Insurance Company retained ABBAE to perform forensic investigation to determine the damage, and provide analysis and opinion on what caused the failure of the fourth floor slab. The building was originally a refrigerated 3-story warehouse that was converted to offices and an additional floor was constructed above the roof. ABBAE performed a floor level survey to document measurable deflections and prepared a findings report determining structural stability, advising on possible hazardous materials contamination, and repair/remedial recommendations.

- **Turner Construction, Irvine, California:** Litigation assistance regarding design deficiencies.

Multi-Family Residential Experience:

Mr. Allana has worked on all aspects of building envelope design for both new as well as remedial work for multi-family construction. His experience includes condition surveys for budgeting and reserve studies, forensic analysis of construction defects, analysis of as-built conditions for preparing remedial construction documents, selection of materials for new construction and reconstruction, preparing remedial design for corrective or restorative work, supervising details for new construction projects, supervision of contract administration, and construction inspection services.

Multi-family residential projects have included all types of roofing systems: green roofs and planters, composition shingles, slate, tile, shakes, fiber cement shake, built up roofing, metal roofing, copper roofing, single ply roofing and polyurethane foam roofing, and other fluid applied roofing systems.

Projects have also included remediation of all types of building envelope assemblies including siding, EIFS, cement plaster, pre-cast and formed concrete, masonry, metal panels, windows, doors, storefronts and curtain wall systems. In addition, Mr. Allana has been involved with remedial design and reconstruction of shear wall assemblies, gypsum board assemblies, plumbing systems; as well as different types of flooring including ceramic tile, concrete, polymer modified cements, and other interior work.

Mr. Allana has been the Principal-In-Charge for the investigation, water testing and destructive testing of assemblies, the selection of materials for new and reconstruction, the preparation of construction documents, the bidding and procurement of construction work, shop drawings and submittal review, construction monitoring, and contact administration services.

Mr. Allana has worked on all types of multi-family construction including condominiums, apartment buildings, and subsidized federal government housing projects. His clientele have owned or managed over 500,000 housing units.

Clientele in this field include: Homeowner associations, REIT's, federal housing agencies, architects designing new projects, property management companies, institutional owners, insurance companies, and attorneys representing homeowners or defending contractors involved in litigation.

Clients in this field include: BRE Properties; Certified Management Company; Hill & Company; Irvine Apartment Communities; Community Management Services; Avalon Bay Communities; Trammel Crow Residential; Prometheus Company; Ventana Property Services; E&S Ring Management; The Matteson Companies; Gibson-

Speno; Hawaiiana Management; Jones & Forrest; Pacific States Management; Cantrell-Harris Associates; Housing Authorities of Santa Clara County, City of Los Angeles. City of Las Vegas, City of Oakland and the City of San Francisco.

Multi-Family Residential Project Examples

- Bay Laguna Homeowners Association, San Francisco, California:** Investigate and evaluate the extent of dry rot damage to the roof, flashing, siding and related building envelope conditions for a 24 unit condominium property. Preparation of design development documents, plans, specifications and construction administration services.
- Crescent Village, San Jose, California:** ABBAE was retained by McLarand Vasquez Emsiek & Partners, Inc. to provide building envelope, waterproofing and roof consulting services. The project is being developed by Irvine Apartment Communities. Crescent Park will contain 1,800 residential units and space for 3,000 cars. There will be five multi-story wood-frame buildings over a single story concrete podium. Additional features of the project will include a clubroom, fitness areas, theater, retail and a Resident Services Office.
- DOMA, San Diego, California:** Investigation, redesign and construction monitoring of structural slab waterproofing, membrane waterproofing, balcony waterproofing, courtyard drains and roofs for multi-family housing development consisting of an eight story loft building with 66 units on the northern portion of the site, and a four story townhouse building with 55 units, combining flats and townhouses on the southern portion.
- Deer Valley, San Rafael, California:** Evaluated waterproofing issues at balconies, breezeways, windows, siding and trim. Provided recommendations for repair, along with remedial construction documents. Provided design, bid and construction management services including construction monitoring.
- Hacienda Commons Apartments, Pleasanton, California:** Complete rehabilitation of 10 buildings, 280 units. Work included plumbing, domestic hot water systems, structural, seismic, HVAC, plumbing, electrical, stucco, site drainage and landscaping. Prepared summary rehabilitation report, construction documents including schematic design, details and drawings for contract work.
- Housing Authority of the County of Santa Clara, Rincon Gardens, California:** Preparation of Capital Needs Assessment to determine cost of rehabilitating all exterior components (roof, windows, stucco, balconies) and all interior components (finishes, cabinets, electrical and WiFi wiring, mechanical systems) of a 200 unit senior housing project. Services included programming, design and construction administration for this stucco clad three story building.
- Marina Harbor, Marina Del Rey, California:** Parking structure investigation and waterproofing, pool decks and landscape planter waterproofing for a 48-acre apartment community. Provided construction management services.
- Mariner's Village, Marina Del Rey:** Retained to perform services for a 921 unit apartment complex consisting of 24 three-story buildings, and with 60 units in four two story buildings. Scope included plaza and foundation waterproofing detection, design and construction monitoring, retaining wall waterproofing design, building envelope remedial design, water and moisture leak investigation, stucco and wood siding repair, reroofing and leak investigations. In addition to resident buildings, there was a small commercial area comprised of 12 buildings that housed various retail and apartment amenities.
- Mission Dolores, San Francisco:** Investigation, analysis and recommendations of roof improvements for single ply, metal and cool roof. Additional scope included design and construction administration services including public bidding for this 92 unit public housing community.
- Montanosa, San Diego:** The initial project, in 2002, consisted of evaluating various exterior building components, balcony decks, stairs and landings for a 472-unit luxury apartment/condominium property. Remedial design and construction documents were provided after the evaluation. After a 2003 wildfire, an assessment was performed to determine the extent of structural damage to various buildings. Reconstruction design and construction phase services were also provided.
- Monterey Townhouse Homeowners Association:** Waterproofing, deck coatings, gutter repairs and reconstruction design and monitoring for townhouses. Additional scope included construction management related services.
- North Park, San Jose, California:** Provided forensic investigation, remedial design, construction monitoring and administration services to repair leaks on several of the buildings. North Park Apartments is comprised of seven apartment complexes, each containing multiple buildings. ABBAE has provided leak investigation services for balcony, roof and plaza deck systems on five of the complexes.
- Palo Alto Plaza Homeowners Association, Palo Alto:** Scope included leak and structural evaluation of a below grade parking structure and plaza for a mixed use property with condominiums above commercial spaces. Investigation included visual observation of leaks and limited water testing of plaza,

planters, expansion joints and utility boxes. Provided recommended repair alternatives and a budget report.

- **Pinnacle at Crow Canyon, San Ramon:** Scope of services included water testing, destructive testing and remedial design for 400 luxury apartment units with hardboard siding, casement and hung windows, private balconies, breezeways and shingle roofs. Evaluated waterproofing issues at the balconies, breezeways, windows, siding and trim and provided recommendations for repair, along with remedial construction documents. Additionally design, bid and construction management services were provided.
- **Pinnacle Emeryville - Avenue 64:** Retained by BRE Properties to provide building envelope consulting for a large urban infill project in Emeryville, California. Avenue 64 Residences is a 224-unit apartment complex with a fitness center, swimming pool and common area. Avenue 64 is a five-story complex, a single-story concrete podium with four stories of wood-frame housing above. The street level is used for parking, with commercial space and leasing offices. The podium deck contains the pool, fitness center and common areas. ABBAE provided waterproofing consulting for the design and construction of the roofing and building envelope systems as well as below-grade waterproofing. We assisted BRE Properties in the bidding phase and provided construction administration and monitoring services.
- **Pinnacle Riverwalk, Corona:** Prepared ASTM E-2018 review of 714-unit apartment community in Riverside County. Analyzed heat pumps, water heaters, kitchen fans, boilers, restroom conditions, building envelope and related features. Multi-year repair and remediation budget was provided to the client followed by design and construction phase services.
- **Pointe Pacific Homeowners Association, Daly City:** Investigation and recommendations for roof repairs on various buildings for a 400-unit condominium complex. Designed a wind resistant roofing system to increase the wind resistance and waterproofing capabilities due to the elevated wind levels and high rainfall of the property's location. Construction management and monitoring services for the roofing project. Services also included leak investigation and evaluation, preparation of a summary report and a budget for repairs of windows, doors, siding and trim.
- **Rosa Parks Senior Apartments, San Francisco:** Scope included investigation and analysis of existing conditions, preparation of spread sheet summarizing needs, preparation of programming and requirements, preparation of construction documents for built up, single ply and composition shingle roofing replacement and repair, and construction administration phase services. The property is a 198-unit senior housing

development owned by the San Francisco Housing Authority.

- **Ryland Mews Homeowners Association, San Jose, California:** Extensive review, investigation and redesign of plaza, patio and building exterior waterproofing for multi-level (three stories over podium) 131-unit condominium complex.
- **San Francisco Housing Authority, San Francisco, California:** Preparation of design documents, including programming, schematic designs, design development documents and construction documents for mechanical, electrical and building envelope systems for numerous large scale housing projects including Ellis Street and Alice Griffith.
- **The Suites at Fisherman's Wharf, San Francisco, California:** Investigation and repair summary report on a four story, 24 unit timeshare condominium property. Provided recommendations for repair and replacement of roof system and components, first level patio waterproofing, roof top deck, and structural waterproofing.
- **Tradewinds Terrace, San Jose, California:** Detailed forensic investigation, evaluation and recommendations for repairs to siding, balcony decks, stairs and roofs of a 300 unit homeowners association. Provided design services and construction management services for replacement of siding, roofs and windows.
- **The Union Building, Los Angeles, California:** Adaptive reuse project consisting of retrofitting the existing 12 story mixed use building that includes a basement, retail areas and residential apartments. Specialized design consultation for waterproofing components, construction plans, details, and specifications.

Highrise Projects:

- **6 Story Building, Las Vegas, Nevada:** Provided investigation and observations of the exterior building façade construction for construction defects. Also performed water testing and destructive testing of the exterior wall systems and water testing of the window and door assemblies.
- **525 University Avenue, Palo Alto, California:** Field evaluation and supervision of exterior building envelope components, for repairs on a 16 story commercial office building consisting of cast-in-place concrete columns with concrete walls.
- **555 Mission Street, San Francisco:** Construction Monitoring Services on the Curtain Wall of a 33-story commercial office building in downtown San Francisco. The scope of work included review of the subcontractor shop drawings for conformance to the specifications for curtain wall system components.

- **717 9th Street, Los Angeles, California:** Lead designer/consultant for below grade waterproofing, plaza decks and window/wall systems for 17 story residential tower.
- **1010 Wilshire, Los Angeles, California:** Adaptive re-use project to convert existing 16-story PacBell central office to residential condominiums. New recreation building adjacent to the tower and retrofit top floors to residential penthouse. Selection of building envelope components and preparation of construction details.
- **Aria HOA, San Diego, California:** Provided forensic litigation services for a 24 stories building.
- **Alta HOA, San Diego, California:** Provided forensic litigation services for a 21 stories building.
- **Beach Villas at Ko Olina, Kapolei, Hawaii:** Provided architectural and engineering consulting services for two new condominium towers of 11 and 15 stories that are adjoined by an underground parking structure. Designed roofing, waterproofing and building envelope components including, below grade waterproofing, plaza decks, and window flashings. Scope included construction administration services including evaluation of proposed bidders, submittal reviews, design clarifications, and construction monitoring.
- **Beau Rivage Hotel, Biloxi, Mississippi:** The hotel suffered major roof damage during Hurricane Katrina in 2005. A firm principal was assigned to personally oversee the project on-site. Provided assessment information, construction details and submittals in a very short time period. Scope included construction documentation and monitoring services.
- **Bellagio Hotel & Casino, Las Vegas, Nevada:** New construction monitoring of built up roof. Analysis, preparation of report and recommendations for EIFS repairs to a 20-story hotel addition, a low rise addition and a mechanical services building.
- **Bellagio Hotel & Casino, Las Vegas, Nevada:** Provided roof inspection and monitoring of a built up roof for new 33-story tower, low rise casino, and mechanical building. Scope included analysis, preparation of report and recommendations for improvement of EIFS along with roof and related building enclosure.
- **Best Western, Plaza Hotel, Honolulu, Hawaii:** Provided corrosion study and assessment of the exterior power transformer and the interior switchgear. A detailed report was prepared documenting our field investigation along with recommendations for remedial repairs including preliminary engineering cost estimates for each repair option.
- **Campus Village Student Housing, San Jose State University, California:** Design review, consulting services and construction monitoring for plaza waterproofing, landscape planters and three level below grade waterproofing for two 17-story towers, over one million square feet.
- **Castle Island Colony, Honolulu, Hawaii:** Conducted investigation of existing concrete spalling conditions, including exterior building coatings and sealants for a 44-story hotel-condominium property located in Waikiki. Provided design of concrete spall repair, including new building coatings and sealants. Scope included construction administration service, including monitoring.
- **Channing House, Palo Alto, California:** Design and construction management for roofing replacement, roof walkway/exercise facility, low leakage rooftop lighting and penthouse storefront window and door replacement. 11 Story Building.
- **County of Alameda Administration Building, Oakland, California:** Evaluation of building leaks and building envelope on 12-story concrete structure. Performed leak detection study, review of condition and provided recommendations for repair. Scope included design services, design review and other follow-on work including construction monitoring.
- **Cupertino City Center, Cupertino, California:** Investigation, testing, and design of remedial repairs to failed window wall systems for a 14 story building.
- **EFI Business Park, Foster City, California:** Design review of roofing and building envelope systems of a multi- building 12 story office tower.
- **Fillmore Center, San Francisco:** Provide preliminary design, budgets, design options, plans and specifications for defect remediation for a 1,114 unit, up to -18-story, multi-family apartment home. Evaluation and assessment for the extent and cause of water intrusion at EIFS panel joints, window wall system, plaza deck area, metal roof, and terrace areas. Damage assessment to the interiors of individual apartments from water leaks. Provided design plans and specifications for remediation work. Prepared a cost estimate for repairs and noted any building code or construction deficiencies. Also provided litigation assistance.
- **Honua Kai, Ka'anapali, Hawaii:** Prepared construction documents and inspection services for roof systems, windows, doors, stucco and EIFS, lanais, below grade waterproofing, shower and bath waterproofing. Inspection services for mechanical systems, sound transmission between walls and floors, chilled water line insulation, vapor retarder systems for a new three building hotel property with towers ranging from seven to ten floors.
- **Island Colony, Honolulu, Hawaii:** A 44-story concrete framed hotel and condominium property, built in the early 1980's, experienced moderate to severe concrete

spalling at multiple locations throughout the structure, including at the lanais of many units. Provided investigation, repair alternatives, order-of-magnitude cost estimates, design, construction document preparation, permitting assistance, bid phase, and construction administration for spall repairs for the entire structure.

- **Imperial Hotel, Honolulu, Hawaii:** Prepared property condition assessment of mechanical, electrical and structural systems, and building envelope for a 27-story tower.
- **Kapiolani Tower, Honolulu, Hawaii:** Provided waterproofing consulting services and construction details for Kapiolani Tower, a 23 story post-tension concrete luxury condominium project. The building has 190 units, ground level residential lobby, first level specialty retail, five levels of above grade parking, a pool/recreation deck on the seventh floor and a rooftop plaza.
- **Luana Kai Resort, Kihei, Hawaii:** Provided forensic investigation to establish cause of water intrusion occurring at a multi-building condominium vacation resort property. Evaluated the condition and remaining life of the roof system. Provided written report of observations, along with recommendations and estimated costs for repair.
- **Monarch Beach Golf Link, Dana Point, California:** Provided waterproofing consulting for a garden roof for the Monarch Beach Golf Link maintenance facility. The roof of the structure is to be covered in a garden roof assembly consisting of a waterproofing system, drainage composite, planting medium and plantings.
- **Ocean View Center, Honolulu, Hawaii:** Investigation of water intrusion for an 8-story office building. Supervised preparation of bid documents and construction administration for sealant replacement.
- **Oracle Corporation, Redwood Shores, California:** Investigation, analysis, preparation of roof condition report and recommendation for replacement on three tower buildings at Redwood Shores campus, along with engineering review of paver wind uplift issues. Preparation of design documents for headquarters building. 17-Story building.
- **Pioneer Plaza, Honolulu, Hawaii:** Evaluation of exterior building envelope components on a 21-story concrete office building with pre-cast exterior concrete panels finished with architectural concrete. Provided repair recommendations, budget, and spall repair and resealing details.
- **Princeville Resort & Condos, Kauai, Hawaii:** Provided a variety of consulting and construction support service for a new resort and condominium complex consisting of 366 units in seven separate two and three story residential buildings with a main amenities building.
- **Royal Iolani, Honolulu Hawaii:** Investigation and remedial repair alternatives for windows, glass panels and wall leaks at 25 year old, 40 story, twin concrete towers with 295 individual units.
- **San Jose State University, San Jose, California (New Construction):** Design review, consulting services and construction monitoring for plaza waterproofing, landscape planters and three level below grade waterproofing for the Campus Village student housing project, a twin 17-story tower consisting of one million square feet.
- **Sky Condominiums, Las Vegas, Nevada:** Provided forensic litigation services for a 45 stories building.
- **The Commodore, Honolulu, Hawaii:** Investigation to determine sources of leaks, and remedial repair alternatives for window and wall leaks at a condominium building in Hawaii. The 25-story concrete residential tower has exterior stucco coating and aluminum framed operable and fixed window units set in framed walls.
- **The Palms at Waikiki, Honolulu, Hawaii:** Conducted leak surveys and investigation, analysis, preparation of design documents, preparation of long term capital budget, construction period services, building permit application for replacement of roofing and infrastructure for a 12-story concrete condominium hotel.
- **Waikiki Skyliner, Honolulu Hawaii:** Investigation and remedial repair alternatives for leaks at the Waikiki Skyliner in Honolulu. The Waikiki Skyliner is a 20-story concrete residential tower with 122 units.
- **West Ocean, Long Beach, California:** Provided forensic litigation services for two towers 2 towers: 30 stories, 22 stories.

Educational & Institutional Experience

As a fiduciary, Mr. Allana has been the Principal-In-Charge and has represented all types of educational and institutional clients on a wide range of projects. His experience includes condition surveys for buildings and structures, short term and long term budgeting, implementation of information management and maintenance database, modernization projects, forensic analysis of the construction defects, analysis of as-built conditions for preparing remedial construction documents, selection of materials for new construction and reconstruction, preparing remedial design for corrective or restorative work, supervising details for new construction projects, preparing standards for inspection and testing, supervision of contract administration, and construction inspection services.

Scope of services has included all types of building envelope systems for both new construction as well as remedial construction. Re-roofing projects have included cold and hot applied built up roofing, modified bitumen

roofing, metal roofing, shakes, tile and fiber cement roofing, single ply roofing, green roofs, polyurethane foam roofing, and other fluid applied roofing systems. Building façade projects have included remediation of many types of building envelope assemblies such as EIFS, cement plaster, pre-cast and cast-in-place concrete, masonry, metal panels, windows, doors, storefronts, and curtain wall systems. Waterproofing projects have included patios, balconies, breezeways, tile and stone flooring and below grade wall. In addition, Mr. Allana has been involved with remedial design and reconstruction of seismic upgrades, roof diaphragm repair and upgrade, wall and roof insulation upgrades, and has assisted in replacement of HVAC systems.

Mr. Allana's involvement with the projects has included assistance with planning of modernization projects, peer review of new construction, preparing plans and specifications, condition surveys, evaluation of existing roofing and building envelope systems, field investigation, water testing and destructive testing of assemblies, selection of materials for new and reconstruction, preparing construction documents, bidding and procurement of construction work, shop drawings and submittal review, construction monitoring, and contact administration services. Mr. Allana has also acted as an expert witness and mediator to resolve disputes between parties, analyzing claims and change orders.

Clients in this field include:

Santa Clara University; Foothill-De Anza Community College District; Stanford University; UC Berkeley; UC San Diego; UC Santa Barbara; Milpitas Unified School District; Marin Community College District; College of San Mateo; Alpine School District; Alum Rock School District; Fremont Union School District; Rim of the World School District; Gilbane Construction; Fisher Friedman Architects; tBP Architects; Sugimura & Associates Architects; Perkins & Will Architects; and others.

Educational & Institutional: Project Examples

- **Alum Rock Union School District, San Jose, California:** Performed design for repair, reroof, roof design for five schools. Scope also included contract administration services.
- **Campus Village, San Jose State University:** Architectural and engineering consulting services for plaza waterproofing, landscape planters, and below grade waterproofing for a three building, mid-rise, student housing project accommodating 2,279 residents. Scope included design review, consulting services, and construction monitoring of three level below-grade and plaza waterproofing system.
- **Christopher High School, Gilroy, California:** Peer review and system selection services for new construction of a 126,000 SF high school. Waterproofing consulting services provided for the roof systems, assemblies and components and the exterior wall systems, assemblies and components.
- **College of Marin, Kentfield, California:** Performed leak surveys, analysis and forensic investigations, along with summary reports for the roofs of over 20 college campus buildings at two campuses. Prepared construction drawings, submittal review, planning study, programming, schematic design, design development, construction drawings and details, and provided construction monitoring.
- **Del Mar High School, Campbell, California:** Investigated claim regarding a building addition. Studied plaintiff/defendant reports, reviewed construction documents, shop drawings, change orders, work stoppage, termination notices, and other correspondence related to the addition.
- **Delano Union School District, Delano, California:** Performed system testing, evaluation, preparation of schematic design and construction documents for installation of a back up chiller at Almond Tree Middle School.
- **Foothill-De Anza Community College District, Los Altos, California:** Leak surveys, analysis and forensic investigations and summary reports for roofs on over 50 buildings. Construction drawings, peer review, submittal review, planning study, programming, schematic design, design development and details, and construction monitoring.
- **Grossmont Union High School District, San Diego, California:** Peer review of roofing, deck coating, wall and exterior skin systems as well as the waterproofing systems for slab on grade foundation, below-grade waterproofing and planter wall waterproofing of a two-story 18,000 SF steel frame building with a concrete foundation.
- **Leeward Community College, Honolulu:** Field survey, waterproofing, documentation and specifications, construction administration for dormitory building.
- **Milpitas Unified School District, Milpitas, California:** Low and steep roof replacement including analysis, design, surveys, construction management and construction monitoring for projects at 10 schools.
- **Palo Alto Unified School District, Palo Alto, California:** Peer reviewed standing seam sheet metal roof repairs to the Escondido Elementary School Library.
- **Poly Canyon Village, California Polytechnic State University, San Luis Obispo:** Peer review of building envelope, including below grade waterproofing for the Poly Canyon Village project, a nine building, multi-story student residential property, with two parking structures that accommodates 2,700 students.

ABBAE additionally prepared construction details and specifications and provided limited construction administration services.

- **Rim of the World Unified School District, Lake Arrowhead, California:** Roof evaluation, repair and replacement design for two elementary schools.
- **San Jose State University, San Jose, California:** Plaza waterproofing, landscape planters and below grade waterproofing for the Campus Village student housing project, a one million square foot development. Design review and consulting services for new construction of three level below-grade and plaza waterproofing system in three towers.
- **San Mateo-Foster City School District, San Mateo, California:** Performed roofing consulting services for the George Hall Elementary School roof replacement project.
- **Santa Clara University, Santa Clara, California:** Forensic investigation of stucco system failure at Bannan Hall. Prepared construction documents for structural and wall systems and construction monitored project.
- **Segundo Dining Commons, University of California, Davis:** Assessment of installed work at the Segundo Dining Commons that required correction or removal due to a six month project suspension for a full service dining, food preparation and food storage facility. Recommended remedial repair alternatives of existing stone veneer wall system along with several building envelope and plumbing components.
- **Soledad Unified School District, Soledad:** Performed roofing consulting services for the San Vicente School roof replacement project.
- **Stanford University, Stanford, California:** Various projects including dormitory buildings, office and education facilities, and research buildings. Projects include, Stern Hall, Cowell Cluster, Jasper Ridge Field Station, Vaden Health Center, and others.
- **Student Services Center, San Jose State University:** Investigation of ongoing leaks at the student center of the occupied office spaces in the center which resides on the first level of a six level reinforced concrete parking structure. Designed and prepared constructions documents for remedial waterproofing repairs of expansion joints.
- **Sweetwater Union High School District, Chula Vista, California:** Peer review services for nine schools, a combination of modernization and new construction projects. Entire scope includes review of construction drawings and specifications, review roofing, exterior walls windows and doors, pedestrian walkways, balconies, decks and building addition transitions.
- **University of California, San Diego:** Peer review of

waterproofing details for new cancer center. Worked with design architect of record to recommend construction details and specifications.

- **University of California, San Francisco, Mission Bay:** Provide peer review of building exterior, building exterior redesign of EIFS, waterproofing and construction monitoring for the 155,000 square foot Mission Bay Community Center, a four story facility housing a fitness complex, with indoor and outdoor swimming pools, conference center, assembly room, a pub and full service kitchens and services, student services and an activity center. Reviewed design for roof to eliminate roof condensation.
- **University of California, Berkeley:** Various roofing, cement plaster and masonry repair projects including Hilgard Hall and South Hall projects.
- **University of San Francisco, San Francisco, California:** Provided consultation services for leak repairs for the Harney Science Building.

Commercial & Industrial Experience

Mr. Allana has worked on all aspects of building envelope design for commercial and industrial buildings. His experience includes condition surveys for budgeting and reserve studies, forensic analysis of construction defects, analysis of as-built conditions for preparing remedial construction documents, selection of materials for new construction and reconstruction, preparing remedial design for corrective or restorative work, supervising details for new construction projects, supervision of contract administration, and construction inspection services.

Projects have included all types of roofing systems including cold and hot applied built up roofing, modified bitumen roofing, metal roofing, single ply roofing, polyurethane foam roofing, and other fluid applied roofing systems. Projects have also included remediation of many types of building envelope assemblies such as EIFS, cement plaster, pre-cast and formed concrete, thin set ceramic tile on exterior wall, dimension stone assemblies, masonry, metal panels, windows, doors, storefronts, and curtain wall systems. In addition, Mr. Allana has been involved with remedial design and reconstruction of seismic upgrades, roof diaphragm repair and upgrade, design of structural assemblies to increase the load bearing capacity of decks, epoxy flooring, mechanical and clean room flooring and waterproofing, wall and roof insulation upgrades, and assisted in replacement of HVAC systems.

Mr. Allana has been the Principal-In-Charge for investigation, water testing and destructive testing of assemblies, selection of materials for new and reconstruction, preparing construction documents, bidding and procurement of construction work, shop drawings and submittal review, construction monitoring, and contact administration services.

Clientele in this field include:

Fortune 100 companies, architects, facilities management companies, and general contractors.

Clients in this field include:

Apple, AMD, Ariba, Bechtel Corporation, Chevron Texaco Corporation, Continental Sales, Cytokinetics, Exelixis, Fisher Bio, Getty Center, Genentech, Hewlett-Packard, Hitachi, IBM, Lifescan, Metlife, NUMMI, Oracle, Protein Design Labs, Qualcomm, SBC Communications, South Bay-side Waste Management Authority, Space Systems/Loral, SRI International, Sun Microsystems, Xerox Corporation and others.

Commercial & Industrial Project Examples

- **525 University Avenue, Palo Alto:** Construction monitoring and construction management related services for concrete restoration and repair for a 15-story office building.
- **1503 Grant Road, Mountain View:** Field observations, water testing and destructive testing to determine the source of the leak areas for a two-story commercial property with a centrally-pitched roof containing a sloped glass skylight over an enclosed central atrium.
- **3350 West Bayshore Road, Palo Alto:** Leak analysis and survey of the foundation for a two story, 62,000 SF commercial building. Additional scope included construction monitoring and administration of the foam injection for the foundation.
- **Bechtel Corporation, San Francisco:** Investigation of the exterior siding for the Waateekaa Train Museum located on the plaza at Bechtel's corporate headquarters. The museum is a replica of the 18 meter long wooden train car that was used to move the Bechtel family between construction sites in the 1920s. Scope included the evaluation of the existing building envelope and associated systems, determining the causes of damage, recommendation remedies for water intrusion repair and preparation of estimated construction costs.
- **Chevron Real Estate Management, San Francisco and Dublin, California:** Investigation, leak surveys, analysis, design, water testing, preparing schematic design and construction documents, construction administration and construction monitoring during roof installation, for eight office buildings consisting of single ply, built up roof, metal roof and tile.
- **City Financial Tower, Honolulu:** Investigation of roofing conditions and design of roof replacement. Scope included evaluation and recommendations for repairs, along with project administration and construction monitoring services.
- **Emery Station East, Emeryville:** Waterproofing inspection service for a new 230,000 SF biotech lab building with a below grade parking lot.
- **Haseko Center, Honolulu:** Preparation of design documents, specifications, and construction observation of remedial roofing repairs for an eight story concrete framed commercial office building.
- **IBM Corporation, San Jose:** Investigation, leak surveys, analysis, reports, preparation of design documents, construction administration and construction monitoring for built up roofs, seismic joints, flashings and related components for various large industrial buildings.
- **IBM, San Jose, California:** Roof surveys on various large industrial buildings on Cottle Road, Almaden Valley, Santa Teresa and other sites. Investigations, leak surveys, analysis, reports, preparation of design documents, and construction administration for built up roofs, seismic joints, flashings and related components.
- **Kapi'olani Medical Center at Pali Momi, Aiea:** Investigation and evaluation of moisture intrusion for building, roof and window system of a concrete and precast concrete mid-rise commercial building with aluminum window frames. Provided repair and design alternatives, along with construction plans, details and specifications.
- **Lawrence Berkeley National Laboratory, Berkeley:** Project consisted of a new addition, rehabilitation of laboratory and office building including HVAC, electrical, plumbing, acoustical, roofing, interior, bathrooms, hardware upgrade, and structural systems. Scope included preparation of design documents, programming, schematic designs, design development documents and construction documents for mechanical, electrical, civil and building envelope systems.
- **McDonald Center, Scripps Hospital, San Diego:** Evaluation of building envelope moisture and water intrusion, including review of building leaks and damage. Scope included an evaluation study and review of conditions. ABBAE Additionally prepared mitigation needs and resolution report.
- **Ocean View Center, Honolulu:** Forensic investigation and remedial repair solutions for water leaks related to the concrete exterior of an eight story concrete framed commercial office building. Scope included preparation of design documents, specifications, bid documents, and construction administration for multiple trades, including painting, sealant replacement and decks.
- **Oracle Corporation, Redwood Shores:** Investigation, analysis, preparation of roof condition report and

recommendation for replacement on three tower buildings at headquarters campus. Scope included engineering review of paver wind uplift issues and preparation of design documents for the headquarters building.

- **Outrigger Canoe Club, Honolulu:** Forensic investigation and condition assessment of mechanical facilities, structural conditions, roof and waterproofing systems. Provided written report documenting investigation, along with recommendations for repair. Scope included the preparation of a 10 year capital replacement plan for major building components and creation of new as-built plans.
- **Pioneer Plaza, Honolulu, Hawaii:** Evaluation of exterior building envelope components, including a budget forecast and schematic design options for repairs on a 21 story commercial office building consisting of cast-in-place concrete columns with pre-cast concrete floor plates and pre-cast exterior concrete panels finished with architectural concrete.
- **Protein Design Labs, Fremont, California:** Leak investigation and evaluation of building envelope components, including exterior reinforced concrete walls and textured surface, storefront windows and associated sealants, roof and associated flashings for a one story, reinforced concrete tilt-up with a low sloped roof. Prepared summary report of leak analysis and provided recommendations for remedial repairs.
- **Sunnyvale Towne Center, Sunnyvale:** Scope of work included building leak detection surveys and forensic investigation of the construction defects. Investigation, analysis and preparation of repair details for below-grade water intrusion, moisture issues, parking area waterproofing and waterproofing of landscape planters in the deck area. The Towne Center has four levels of below-grade parking with six stories of commercial office space above.

Local & Federal Government Experience

As a fiduciary, Mr. Allana has been the Principal-In-Charge and has represented all types of local and federal government clients as a design and construction expert on a wide range of projects. His experience includes condition surveys for all city/county owned buildings and structures (interior and exterior), preparing five and 10 year budgets and reserve studies, implementation of information management and maintenance database, forensic analysis of construction defects, analysis of as-built conditions for preparing remedial construction documents, selection of materials for new construction and reconstruction, preparing remedial design for corrective or restorative work, supervising details for new construction projects and supervision of contract administration and construction inspection services.

Government projects have included all types of roofing

systems including cold and hot applied built up roofing, modified bitumen roofing, metal roofing, shakes, tile and slate roofing, single ply roofing, polyurethane foam roofing and other fluid applied roofing systems.

Projects have also included remediation of building envelope assemblies as well as cement plaster, pre-cast and formed concrete, masonry, metal panels, windows, doors, storefronts, and curtain wall systems. In addition, Mr. Allana has been involved with remedial design and reconstruction of seismic upgrades, roof diaphragm repair and upgrade, wall and roof insulation upgrades, and assisted in replacement of HVAC systems.

Mr. Allana's involvement with the projects has included field investigation, water testing and destructive testing of assemblies, selection of materials, preparing construction documents, bidding and procurement of construction work, review of shop drawings and submittals, construction monitoring and contact administration services. Mr. Allana has also acted as an expert and mediator to resolve disputes between parties, analyze claims and change orders, and assisted attorneys as an expert.

Clients in this field include:

NASA Ames Research Center; San Francisco Housing Authority; U.S. Navy Western Division Naval Facilities Engineering Command; California National Guard; City of San Jose; City of Sacramento; City and County of San Francisco; City of Los Gatos; City of Sunnyvale; City of Saratoga; City of Modesto; County of Santa Clara; County of Sonoma; County of San Mateo; Stanford Linear Accelerator Center; and others.

Local & Federal Government Project Examples

- **City of Fremont, Fremont, California:** Forensic investigation and assessment of numerous water leaks in the cells and property storage facility for a three story detention center. Prepared evaluation report, including budget cost estimates for repairs.
- **City of Livermore, Livermore, California:** Rehabilitation of roofing systems and building envelopes. Facility condition assessment for roofing and building envelopes for 40 city owned buildings. Reviewed conditions, prepared life cycle costing for repair and replacement. Developed plans and specifications, and provided recommendations to City staff for replacement. Provided construction administration and construction phase services, including roof construction monitoring.
- **City of San Jose, San Jose, California:** Building envelope repairs, roofing and waterproofing for four multi-story government buildings.
- **County of Sonoma, Santa Rosa, California:** Investigation, surveys, report preparation, schematic design, design development, construction drawings, plans and specifications, construction administration

and construction monitoring for built up roof and single ply roof on multiple county administration buildings.

- **City of Sunnyvale, Sunnyvale, California:** Evaluate roof conditions for a built up roof at the municipal golf course maintenance building.
- **County of Alameda, Oakland, California:** Evaluation of metal roof failure for an administration building located at 951 Turner Court in Hayward, California.
- **County of Solano, Fairfield, California:** Litigation support services for the Fairfield Civic Center Library, a 65,000 square foot public library with standing seam copper and single ply roof and skylights. Investigation, analysis, water testing, report preparation, schematic design development, construction administration, submittal and RFI review for roof replacement and building envelope leak repairs on brick fascia.
- **Housing Authority of the County of Santa Clara, San Jose, California:** Investigation and assessment of siding and roofing replacement for a 101 unit low income senior housing apartment property. Budget estimates including life cycle cost implications and potential value engineering opportunities. Construction details and specifications for building envelope components. Bidding and construction administration services.
- **Lawrence Livermore National Laboratory, Livermore, California:** New addition, rehabilitation of laboratory and office building. HVAC, electrical, plumbing, acoustical, roofing, interior, bathrooms, hardware upgrade, and structural systems including preparation of design documents, programming, schematic designs, design development documents and construction documents for mechanical, electrical, civil and building envelope systems.
- **NASA Ames Research Center, Moffett Field, California:** Visual analysis, destructive along with non-destructive moisture testing, and evaluation of a built up roof at Building 211.
- **San Francisco International Airport, San Francisco, California:** Multiple large projects for individual buildings to repair and rehabilitate leaks and other water intrusion.
- **San Diego International Airport, San Diego, California:** Building Envelope Engineer of Record services on the \$330 million Terminal 2 Expansion at the San Diego International Airport. ABBAE provided 30% design of steel truss framing for glass curtain wall, 30% design for tubular steel mullion framing of storefront windows and 100% design of the curtain wall and light gauge metal stud building envelope. ABBAE provided peer review of design concepts, providing structural design alternatives, structural calculations, construction documents, specifications and construction

administration.

- **City of San Jose, Norman Y. Mineta San Jose International Airport, San Jose, California:** Peer review of component and system selection for the building envelope system of the North Concourse including, below grade waterproofing, waterproofing underneath concrete slab, elevator pit waterproofing, aluminum panel systems, stucco, pre-cast concrete panels, concrete masonry unit (CMU) split face, painted CMU, flush seam metal panel roof systems, single ply roof systems, built up roof systems, seismic joints, doors, windows, other related building envelope and wall systems, and associated components such as roof slope, crickets, appropriate number of plies, terminations, insulation, underlayments, substrates, sealants, flashings, gutters and transitions. Redlining 75% and 100% construction details.
- **State of Hawaii, Department of Transportation, Airports Division, Honolulu, Hawaii:** ABBAE worked with Honolulu International Airport on the following projects: re-roofing for the Central Concourse Buildings, the Overseas Terminal Canopy, and the constructing the new Wiki Wiki Shuttle Buildings. ABBAE provided investigation, design, construction documents, construction administration, construction management, and construction monitoring and observations for all facets of these projects. ABBAE's scope included roofing and waterproofing design, structural and mechanical consulting.

Architect Experience

Mr. Allana has worked with numerous architectural firms to assist them with preparation of construction drawings related to new construction projects as well as with remedial projects related to building envelope reconstruction. Mr. Allana's involvement with the projects has included selection of materials for new construction and reconstruction, preparing construction documents, completing field investigation to define extent and cause of problems, performing water testing and destructive testing of assemblies, bidding and procurement of construction work, shop drawings and submittal review, construction monitoring, and contact administration services.

Mr. Allana has assisted architects with selection of materials for building envelope assemblies including all types of roofing systems, cement plaster, dimension stone, pre-cast sealant joints, and formed concrete contraction joints, flashing for masonry, metal panels, windows, doors, storefronts, and curtain wall systems.

Architectural Clients include:

Anbe Aruga & Ishizu Architects, Anderson-Brule Architects, AOME Architects, Architects Hawaii, Architects

Orange, Architectural Resources Group, Behr Browsers Architects, BDG Architects, Bohlin Cywinski Jackson, Bunton Clifford Associates, Inc., Callison Architecture, Cody Anderson Wasney Architects, Corgan Associates, de Reus Architectural, DES Architects & Engineers, DGA Architectures, DMJMH+N Design, Durrant Media Five, Eight, Inc., Fennie + Mehl Architects, Field Paoli Architects, Fisher-Friedman Associates, Fleming & Associates, Form 4 Architecture, Gensler Architects, Hawley Peterson & Snyder Architects, Harris & Associates, Hayes Group Architects, HDR Architecture, Hibser Yamauchi Architects, HMC + Beverly Prior Architects, HNTB Architects, HTI Architects, Inc., John Hara & Associates, Johnson Fain Architects, Jordan Architects, Joseph Wong Design Associates, Kanner Architects, Killefer Flammang Architects, KMD Architects, LCA Architects, MBT Associates, Montes Laudano Architects, MVE - McLarand Vasquez Emsiek & Partners, MGA Architecture, Moore RubleYudell Architects, NAC | Architecture, NTD Architects, Perkins+Will, Rafael Vinoly Architects, RIM Architects, Sato & Associates, SHKS Architect, Solomon Cordwell Buenz, Sprotte+Watson Architecture, Stantec / Anshen+Allen, Steinberg Architects, Stoecker & Northway Architects, Inc., Studio Bergtraun Architects, Sugimura & Associates Architects, tBP Architects, Tiland/Schmidt Architects, Thomas P. Cox Architects, Inc., WCIT Architecture, Inc., WRNS Studio

Architect

Project Examples

- **Belmont Library, Belmont, California:** Peer review of building envelope system for a new 18,000 square foot library building. Review of the design development drawings and specifications.
- **Peninsula Jewish Community Center, Foster City, California:** Building envelope review for a new community center. Also provided peer review of the mechanical system for a 50,000 square foot athletic center containing an indoor swimming pool and spa.
- **Westin Ka'anapali Ocean Resort Villas, Lahaina, Hawaii:** Performing construction review, forensic analysis and inspection for the following building systems now under construction at two new buildings on Lot 1: Exterior Insulation and Finish System (EIFS) walls, other exterior walls, concrete tile and built up roofs, chilled water piping insulation and bathroom showers. Also providing design, construction administration and construction inspection of multiple trades including EIFS, windows, doors, showers, below grade waterproofing, roofs and sheet metal for new buildings on Lot 2. Design review underway and construction period on Lot 2 is scheduled for Spring 2005 through Fall 2006.
- **The Ritz Carlton, Kapalua, Hawaii:** Design, construction management and inspection services for the upgrade of a 548 room luxury hotel and resort.

Energy Project Experience

Mr. Allana is knowledgeable in a multitude of energy solutions and works with clients in selecting the most appropriate generation technology based upon geographical location, site specific, financial, and other conditions provided by clients.

- **401/403 Hillcrest, Thousand Oaks, California:** Solar PV planning and system engineering, develop bid specifications and bid phase services
- **Pacific Biosciences Research Center and the Sinclair Library, Honolulu, Hawaii:** Engineer and design multiple roof-mounted solar PV systems and develop an RFP bid package for the University of Hawaii (UH). ABBAE will also provide quality assurance and construction monitoring services during construction.
- **Solar Consulting Services, Los Angeles Unified School District (LAUSD), Los Angeles, California:** Installation and deployment of solar PV. Scope included review and recommendation of revisions to LAUSD's initial RFP for district wide Solar PV installation and applying.
- **Feasibility Study, San Mateo County Community College District (SMCCCD), San Mateo, California:** Solar PV planning, system engineering and wind energy feasibility and planning at multiple campuses for the SMCCCD.
- **Juanita Millender Community Center, Carson, California :** Engineering design and installation of a 184 kW solar energy system to be located at the Juanita Millender Center for the City of Carson.
- **Leslie Shao-ming Sun Field Station, Woodside, California:** Peer review of entire building envelope system, including roof design for new construction of an academic research facility. The roof has a 22kW solar array connected to the grid with real-time monitoring that generates between 60 and 80% of the building's energy consumption.
- **USS Bowfin Submarine Museum and Park, Honolulu, Hawaii:** Development of a 177kW roof mounted solar system for the USS Bowfin museum.
- **The Pier Apartments, Jersey City, New Jersey:** Development of a 100kW solar energy system with a projected in-service date of the second quarter of 2011. ABBAE was also retained to conduct an Energy Audit to determine viable energy conservation measures and possible energy generation programs.
- **Applied Materials, Santa Clara, California:** ABBAE provided extensive energy and mechanical analysis, including dedicated Energy Efficiency Measures (EEM) and economic analysis. ABBAE provided reports for each building with life cycle costing, ROI recommendations and, where applicable, recommendations for replacement systems and cost/benefit analysis.

- **Bellingham Elementary, North Hollywood, California:** ABBAE provided a solar engineering consulting services for roof mounted grid tied solar PV system including preparation of structural and electrical plans (full details and specifications), DSA submittal coordination and construction administration.
- **Peralta Community College District, San Mateo, California:** ABBAE provided a full scope of solar PV consulting and engineering services to the District including assessment of multiple campus sites for solar. ABBAE's assessment services included digital solar PV shading analysis, system sizing, individual building assessments for roof condition and solar roof integration planning and design, energy analytics and production modeling and forecasting.
- **San Mateo County Community College District, San Mateo County, California:** ABBAE's scope included feasibility planning for solar PV, solar thermal, pool thermal, wind-turbines, and on-site cogeneration including fuel cells and microturbines, preliminary system engineering and analysis, remediation of problems at the existing cogeneration plants, energy analytics, interconnection analysis and strategy, and detailed financial analytics and economic feasibility studies. ABBAE investigated and determined which renewable energy technologies were most appropriate to achieve reliable, long term energy savings.
- **City of Livermore, Livermore, California:** ABBAE completed solar PV system expansion feasibility analysis, solar PV system engineering, specification development, and roof integration design for the City of Livermore Phase II deployment of solar PV at selected City facilities. Design included a custom high rack solar PV mounting solution.
- **County of Santa Barbara, Santa Barbara, California:** ABBAE performed inspections of array racking, conductors, inverter, and the monitoring system. We also conducted a performance test and delivered a detailed commissioning report. This hillside mounted project involves significant technical challenges including multiple topographical changes impacting array orientation and tilt.
- **Hermes Flagship Retail Store, Beverly Hills, California:** Solar engineering services including preparation of electrical plans (full details and specifications), local utility submittal coordination and commissioning for a roof mounted grid tied Solar PV system.
- **Horizon Ridge, Las Vegas, Nevada:** Core energy consulting services for this newly constructed facility and reduced energy cost by 43% or 516,000 kWh from the new construction baseline. The services included a complete energy assessment, energy master planning, project development, implementation, and construction administration.
- **Northpark Apartments, Burlingame, California:** Installation of roof-mounted solar PV system. ABBAE's scope of work included complete development, custom high rack mount design, energy engineering and installation, start-up, and commissioning of the system.
- **Northridge Apartments, Pleasant Hill, California:** Energy analysis and life cycle cost analysis to determine the economic value associated with the proposed renewable energy measure.
- **Skyline Terrace Apartments, Burlingame, California:** Development, of a custom high rack mount design, energy engineering and installation, start-up, and commissioning of the system.
- **Sugar Beach Resort, Maui, Hawaii:** Investigation, energy analysis, life cycle cost analysis, design, and construction management services for rooftop mechanical equipment, chilled water piping and pipe insulation and indoor fan coil unit upgrades and repairs.
- **Casa Granada, Los Angeles, California:** Evaluated and investigated the existing solar hot water system to determine cost performance and effectiveness. T
- **Archstone, Various Sites, California :** Investment Grade Energy Audit and identified numerous energy conservation and generation measures to be implemented. This included high efficiency LED lighting and multiple other conservation measures along with roof mounted solar PV system.
- **Mahana, Kannapail, Maui, Hawaii:** Energy conservation and building performance analysis work involved the implementation of power optimization for the site, including power balancing, power factor correction, and other measures to reduce electrical loads and consumption on site.

General Contractor Experience

Mr. Allana has assisted numerous general contractors and sub-contractors with the design of complicated building envelope areas, constructability and peer review of construction documents, monitoring and inspection of construction work, water testing and destructive testing, and other services.

Contractor Clients include:

Gilbane Construction; Vance Brown Construction; DPR Construction; Hathaway Dinwiddie; Draeger Construction; Gordon-Prill Inc.; Saarman Construction; Turner Construction; San Jose Construction; Swinerton Builders; Alcal Roofing; Best Roofing; and Western Roofing.

General Contractor Project Examples

- **463 Milpitas Boulevard, Milpitas, California:** Roof condition survey for a 50,000 square foot commercial building with a built up roof over industrial clean room space.
- **Bellagio Hotel and Casino, Las Vegas, Nevada:** Roof inspection and monitoring of a built up roof for new 33 story tower, low rise casino, and mechanical building. Analysis, preparation of report and recommendations for improvement of EIFS along with roof and related building enclosure.

- **Mirage Hotel and Casino, Las Vegas, Nevada:** Roof and below-grade waterproofing evaluation and assessment for showroom remodel.
- **San Mateo County, Youth Services Center, San Mateo, California:** Peer review of existing construction documents, construction administration services including submittal review and other services, construction monitoring, investigation of below grade waterproofing systems, and project close.

Presentations and Publications

- "Solving Water Intrusion and Mold Problems in California," Lorman Education Services, Oakland, California.
- "Forensic Analysis of Roofing Systems," International Roofing Exposition, Orlando, Florida.
- "Change Orders in California," Lorman Education Services, Santa Clara, California.
- "Design Issues, Roof Selection, Cool Roofs," City of San Jose Roofing Seminar, San Jose, California.
- "Siding, Trim and Painting Issues," Executive Council of Homeowners (ECHO) Fall Maintenance Seminar, Sunnyvale, California.
- "Common Defects and Failure Modes in Cement Plaster," Roof Consultants Institute (RCI) Symposium on Building Envelope Technology, Heron Bay, Florida.
- "Condensation Control Mechanisms in Exterior Wall Assemblies," RCI, Phoenix, Arizona.
- "Roofs Can Last In Excess of 30 Years, But Most Do Not," RCI, Honolulu, Hawaii.
- "Building Envelope University" Los Angeles and San Francisco.
- "Solar Solutions," Honolulu, Los Angeles, Santa Clara.
- "Building Envelope Preventative Maintenance and Repair," Northern California Facilities Expo.
- "Engineering Approach to Solar PV and Best Practices Protocols."
- "A Critical Review of Life Span of TPO, PVC and various forms. Other Single Ply Roof Membranes," 11th Annual RCI Hawaii workshop, Honolulu.
- "Mastering the Design Issue of Solar Photovoltaic Installation on an Existing Roof," RCI International Convention, Reno, Nevada.
- "Advanced Waterproofing," RCI Houston, Texas.
- "Mitigating Risks and Protecting your Investment," Honolulu
- "Building Envelope Commissioning," University of California
- "Building Envelope Commissioning and Case Study" CECTO Building, Los Angeles and San Francisco.
- "Building Envelope University" Washington. (2012)
- "Building Envelope University" Los Angeles. (2013)
- "Building Envelope University" San Francisco. (2013)
- Solar Energy Panel, Marcus and Millichap, Burlingame, California (2013)
- "Building Performance University," San Francisco (2014)
- "Building Performance University," Irvine (2014)
- "Building Performance University," Los Angeles (2014)
- "Fundamentals of Proper Energy Conservation Design, RCI Convention, Tampa, Florida (2014)

EXHIBIT “B”

CURRICULUM VITAE

Christiana Drake

Personal Information

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U.S Citizen: Yes

Areas of Interest

Research Interests

Chris Drake's primary research interest is in causal inference in observational studies. She has studied various methods of estimating causal effects in the presence of confounders. One method of particular interest to her is adjustment by the propensity score. She has investigated the performance of estimators adjusted for confounders by the propensity score to parametric models with regard to remaining bias after adjustment for known confounders. Furthermore she has looked at the efficiency of such estimators. Another area of considerable interest to her is identifying prognostic factors with non-random missing outcomes. carrying out a complete case analysis can lead to misleading conclusions, in the worst case a complete reversal of the relationship between prognostic factor and outcome is observed as Simpson's Paradox demonstrates. Chris Drake has combined propensity score methodology with imputation methods and subclassification methods to include all available information in building prognostic models and reduce bias due to informative censoring. Chris Drake has collaborated with medical researchers and epidemiologists on several large and still ongoing studies. This has sparked her interest in violence prevention studies, particularly those areas related to gun violence. Most such studies have binary and/or heavily skewed outcomes. Relative risk and odds ratio are often the measure of association between outcome and risk factor of choice. Relative risk and/or odds ratio in criminal justice data tend to vary with age. The precise functional form is unknown and often not easily accomodated

by parametric functions. Thus, Chris Drake in collaboration with others has developed non-parametric estimators of such measures. Finally, Chris Drake also has an interest in diagnostic measures such as sensitivity and/or specificity of tests where multiple observations are taken on the same experimental unit. It is not obvious how to measure and compare the performance of diagnostic tests. Chris Drake has worked on creating such measures and examining their performance in comparison to more traditional approaches.

Education

Education and Training

1983-1989	University of Washington, Seattle, Washington, Ph.D., Biostatistics
1980-1982	Harvard School of Public Health, Mass, S.M., Biostatistics
1983-1980	State University of New York at Stony Brook, New York, B.S., Applied Mathematics

Education: Additional Information

Languages

Fluent in German

Computing Languages

Fortran Programming, Knowledge of SAS, Splus, SPSS

Employment

Employment History

Summer-1981	Sidney Farber Cancer Institute, Boston, MA, Research Assistant
July 1982-August 1983	Prudential Reinsurance Company Prudential Reinsurance Company, Newark, NJ, Actuarial Assistant
Sep. 1988-June 1989	Harborview Injury Prevention and Research Center, Seattle, WA, Research Assistant
Sep. 1983-Aug. 1984	University of Washington, Department of Psychiatry, Seattle, WA, Research Assistant
Sept 1984-Aug 1988	University of Washington, Department of

September 1989-June 1995	Biostatistics, Seattle, WA, Teaching Assistant University of California, Davis, Department of Statistics, Davis, CA, Assistant Professor
July, 1995-June, 2006	University of California, Davis, Department of Statistics, Davis, CA, Associate Professor
July, 2006-present	University of California, Davis, Department of Statistics, Davis, CA, Professor

Employment: Additional Information

Consulting - 1995

Nathan Kline Institute for Mental Health, Orangeburg NY, Statistical Analysis with Informative Censoring

Consulting - 1991 - present

Phytosphere Consulting: studies of tree recruitment of California trees, tree death and agricultural practices

Consulting

Yolo County DA's office: insurance fraud
CA EDD: investigation of employer practices regarding employee status for purpose of possible evasion of workers' comp

Grants and Contracts

Grants Active

1-1-10 - 12-31-12 \$10,800, Trainer, Differential Delivery of Follow-up Care and Survivorship Among Latinos Using Medicare, Julie Smith Gagen (Principal Investigator), American Cancer Society Training Grant, Percentage Effort=2%

7-15-10 - 7-15-12 \$35,416, Co-Investigator, Is a Lack of Quality Follow-up Care Related to Shorter Survival in Latino Cancer Survivors?, Julie Smith Gagen (Principal Investigator), NIH, Percentage Effort=10%

Grants Completed

- 09/29/1990 - 07/31/1993 Grant #R49CCR/903549, \$590,650, Co-Investigator, Criminal History as a Predictor of Criminal Activity, Garen J. Wintemute, MD, MPH, School of Medicine (Principal Investigator), Centers for Disease Control.
- 09/30/1992 - 08/31/1998 Grant #R49-CCR908815, \$1,559,805, Co-Investigator, Violence Prevention Research Program, G.J. Wintemute, MD, MPH. (Principal Investigator), Centers for Disease Control and Prevention, Percentage Effort=10%
- 07/01/1993 - 06/30/1996 Grant #94-17, \$450,000, Co-Investigator, Violence Prevention Initiative, G.J. Wintemute, MD, MPH. (Principal Investigator), California Wellness Foundation, Percentage Effort=10%
- 12/01/1997 - 05/31/2000 Grant #98-IJ-CX-0024, \$160,046, Co-Investigator, Effectiveness of Denial of Handgun Purchase, Garen J. Wintemute, M.D., M.P.H., Med.: Epi & Prev (Principal Investigator), The National Institute of Justice, Percentage Effort=3%
- 09/01/1998 - 02/28/2000 Grant #number one, \$80,707, Co-Investigator, VPRP: Violence Prevention Research – Mortality Study, G.J. Wintemute, MD, MPH, Med: Epi & Prev Med (Principal Investigator), The Joyce Foundation, Percentage Effort=3%
- 10/01/1998 - 09/30/1999 Grant #5-2-98, \$24,970, Co-Investigator, Bias caused by loss to interview in cancer case-control studies, JJ Beaumont, PhD, MSPH, Med: Epi & Prev Med (Principal Investigator), American Cancer Society, Percentage Effort=2%
- 12/01/1998 - 11/30/2000 \$316,175, Co-Investigator, Firearm violence in California, GJ Wintemute, MD, MPH, Med: Epi & Prev Med (Principal Investigator), The Soros Foundation
- 12/01/1998 - 11/30/1999 \$93,288, Co-Investigator, Incidence of and risk factor for domestic violence among legal purchasers of handguns, GJ Wintemute, MD, MPH, Med: Epi & Prev Med (Principal Investigator), National Institute of Justice
- 01/01/1999 - 12/30/2000 Grant #99-00496V-10194, \$122,124, Co-Investigator, Bias with loss to interview in prostate cancer epidemiology, J. Beaumont (Principal Investigator), California Cancer Research Program, Percentage Effort=10%
- 01/01/1999 - 12/03/2003 Grant #P98.0034, \$900,000, Principal Investigator, Evaluation of the Preventing Parolee Crime Program, State of California, Department of Corrections, Percentage Effort=35%

07/01/1999 - 06/30/2000	Grant #2, \$164,206, Co-Investigator, VPRP: Violence Prevention Research – Policy Development and CCW Study, G.J. Wintemute, MD, MPH, Med: Epi & Prev Med (Principal Investigator), The Joyce Foundation, Percentage Effort=6%
1999 - 2002	\$150,000, Co-Investigator, Cancer Research, California Cancer Coordinating Committee
1999 - 2001	\$50,000, Co-Investigator, Cancer Research, California Cancer Research Program
2003 - 2003	\$50,000, Principal Investigator, Cancer Research, California Department of Health Services

Honors & Awards

1976-1980	Award for outstanding academic achievement at graduation from S.U.N.Y. Stony Brook
1985-1988	School of Public Health Fellowship, University of Washington
1988-1989	NIH Predoctoral Fellowship

Publications

Journals

1989	Rivara, F.P., A.B. Bergman, and <u>C. Drake</u> . Parental attitudes and practices toward children as pedestrians. <i>Pediatrics</i> , 84: 1017-1021.
1991	Anderson, P.A., F.P. Rivara, R.V. Maier, and <u>C. Drake</u> . The epidemiology of seatbelt- associated injuries. <i>Journal of Trauma</i> , 31(N1): 60-67.
1991	Wintemute, G.J., <u>C. Drake</u> , and M. Wright. Immersion events in residential swimming pools: evidence for an experience effect. <i>American Journal of Diseases in Children</i> , 145: 1200-1203.

- 1993 Drake, C. and A. McQuarrie. The power of the Mantel-Haenszel Test when adjustment is by the true or estimated propensity score. *Biometrical Journal*, 35: 445-449.
- 1993 Barrett, J.R., J.L. Tanji, C. Drake, D. Fuller, R.I. Kawasaki, and R.M. Fenton. High- vs. low-top shoes for the prevention of ankle sprains in basketball players: A prospective randomized study. *The American Journal of Sports Medicine*, 21(4): 582-585.
- 1993 Drake, C. Effects of misspecification of the propensity score on estimators of treatment effect. *Biometrics*, 49(4): 1231-1236.
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Book Chapters

2007 Drake, C., R. Levine, and E. A. Laska: Recovery from Schizophrenia, Hopper, Kim, G. Harrison, A. Janca, N. Sartorius, (ed), *Recovery from Schizophrenia*, Oxford University Press.

Service

Service: Additional Information

Consulting - 2002-2003

Advised independent journalist investigating suspected cancer cluster in a Nevada town housing military base.

Consulting - 2001-2002

Yolo County DA's Office; School of Veterinary Medicine (2 projects); School of Medicine - Center for Health Services Research in Primary Care: Department of Epidemiology and Preventive Medicine).

Consulting - 2000-2001

School of Veterinary Medicine, UCD; School of Medicine, UCD: Center for Health Services Research in Primary Care, Dept. of Epidemiology and Preventive Medicine

Consulting - 1996-1997

Throughout the period, consulted in the Schol of Vet Med (Approx 6 Projects); School of Medicine; Department of Radiology; Center for Health Services Research in Primary Care; and the Department of Epidemiology and Preventive

Medicine.

Consulting - 1995-1996

Pacific Gas and Electric, Association of California Water Agencies

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1999-2000	Shagufta Aslam, Member, Ph.D., Awarded
2000-2001	Newton Wai, Member, Ph.D., Awarded
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2001-2002	Xiaoyun Zhong, Member, Ph.D., Awarded
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2003-2004	Julie Smith, Chair, Ph.D., Awarded
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2004-2005	Bernard Jahn, Member, Ph.D., Awarded
2004-2005	Hsin Huang, Member, Ph.D., In Progress
2005-2006	Zhonghua Gu, Member, Ph.D., Awarded
2006-2007	Aybike Ongel, Member, Ph.D., Awarded
2006-2009	Elizabeth Yakes, Member, Ph.D., Awarded, Postdoctoral Research in Burkina Faso
2007-2010	Travis Loux, Chair, Ph.D., In Progress
2007-2010	Yun-Kai Jiang, Co-Chair, Ph.D., In Progress
2007-2008	Lawrence Lee, Member, Ph.D., In Progress
2007-2008	Bitao Liu, Member, Ph.D., Awarded
2008-2008	Naomi Saito, Member, Masters, Awarded
2008-2009	Ying-Fang Wang, Member, Ph.D., Awarded
2010-2010	Hui Wang, Member, Ph.D., In Progress

PROOF OF SERVICE
(CCP §§ 1013(a) and 2015.5; FRCP 5)

State of California,)
) ss.
County of Alameda)

I am employed in the County of Alameda. I am over the age of 18 and not a party to the within action. My business address is 1999 Harrison Street, Suite 1700, Oakland, California 94612.

On the below date, I served the foregoing document described as **McLARAND, VASQUEZ & PARTNERS, INC.'S SUPPLEMENTAL EXPERT WITNESS DESIGNATION** on the interested parties in this action by placing same in a sealed envelope, addressed as follows:

See Service List Attached Hereto

- (BY MAIL)** - I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail in Oakland, California to be served on the parties as indicated on the attached service list. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Oakland, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

- (BY CERTIFIED MAIL)** - I caused such envelope(s) with postage thereon fully prepaid via Certified Mail Return Receipt Requested to be placed in the United States Mail in Oakland, California.

- BY EXPRESS MAIL OR ANOTHER METHOD OF DELIVERY PROVIDING FOR OVERNIGHT DELIVERY**

- (BY ELECTRONIC FILING AND/OR SERVICE)** - I filed and served a true copy, with all exhibits, electronically on designated recipients listed on the attached Service List via 12/04/15 (Date) at a.m. (Time)
Glotrans, per E-Filing and E-Service Standing
Order of 08/28/06, on: _____

- FEDERAL EXPRESS** - I caused the envelope to be delivered to an authorized courier or driver authorized to receive documents with delivery fees provided for.

- (BY FACSIMILE)** - I caused the above-described document(s) to be transmitted to the offices of the interested parties at the facsimile number(s) indicated on the attached Service List and the activity report(s) generated by facsimile number (510) 844-5100 indicated all pages were transmitted.

- (BY PERSONAL SERVICE)** - I caused such envelope(s) to be delivered by hand to the office(s) of the addressee(s).

Executed on **DECEMBER 4, 2015** at Oakland, California.

- (STATE)** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

- (FEDERAL)** - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



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CILKER APARTMENTS v. WESTERN NATIONAL CONSTRUCTION, et al
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