

# EXHIBIT H

# Gallery Condominium Association v. K Hovnanian Developments of Arizona, Inc.

BHA #19-7096

## Preliminary Defense Cost to Repair

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<b>ISSUE SUMMARY</b>			<b>Direct Cost</b>		<b>Burdened Cost</b>
1.0	STRUCTURAL		0		0
2.0	CIVIL		0		0
3.0	BUILDING ENVELOPE		496,198		731,396
4.0	MISCELLANEOUS		11,191		16,496
<b>TOTAL</b>			<b>507,389</b>		<b>747,892</b>

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<b>I.</b>	<b>STRUCTURAL (Costs and repairs are based upon SBSA, LLC, A Charles Taylor Company's Construction and Design Compliance Report, dated 06/23/2021, and Supplemental Construction and Design Compliance Report, dated 10/14/2021.</b>				
<b>1.0</b>	<b>Compliance with Geotechnical Report</b>				
	<p><b>Allegation:</b></p> <p>The original geotechnical report presents recommendations for over excavation, soil stabilization, and drainage on the site.</p> <p>1.01 Review the original geotechnical report for applicable design and construction recommendations for informational purposes.</p> <p><b>Defense Repair Scope:</b> Per PGG: No repair</p> <p><b>Defense Location:</b> Per PGG: No repair</p>				
1.01	<b>Subtotal by issue</b>				<b>0</b>
<b>1.0</b>	<b>Compliance with Geotechnical Report - SUBTOTAL</b>				<b>0</b>
<b>2.0</b>	<b>Lateral Force Resisting System (LFRS)</b>				
	<p><b>Allegation:</b></p> <p>2.01 Non-Compliant LFRS</p> <p><b>Defense Repair Scope:</b> No repairs</p> <p><b>Defense Location:</b> No repairs</p>				
2.01	<b>Subtotal by issue</b>				<b>0</b>
<b>2.0</b>	<b>Lateral Force Resisting System (LFRS) - SUBTOTAL</b>				<b>0</b>
<b>I.</b>	<b>SUBTOTAL - STRUCTURAL</b>				<b>0</b>

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II	<b>CIVIL (Costs and repairs are based upon SBSA, LLC, A Charles Taylor Company's Construction and Design Compliance Report, dated 06/23/2021, and Supplemental Construction and Design Compliance Report, dated 10/14/2021.)</b>				
1.0	<b>Grading and Drainage</b>				
1.0a	<p><b>Allegation:</b> Drainage Bounded by Concrete Flatwork</p> <p><b>Defense Repair Scope:</b> <b>Per PGG:</b> No repair</p> <p><b>Defense Location:</b> <b>Per PGG:</b> No repair</p>				
1.0a	<b>Subtotal by issue</b>				<b>0</b>
1.0b	<p><b>Allegation:</b> Non-Compliant Management of Concentrated Flows</p> <p><b>Defense Repair Scope:</b> <b>Per PGG:</b> No repair</p> <p><b>Defense Location:</b> <b>Per PGG:</b> No repair</p>				
1.0b	<b>Subtotal by issue</b>				<b>0</b>
1.0	<b>Grading and Drainage - SUBTOTAL</b>				<b>0</b>

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<b>2.0</b>	<b>Concrete Flatwork</b>				
	<b>Allegation:</b>				
2.0a	Non-Compliant Cross-Slope of Sidewalks				
	<b>Defense Repair Scope:</b>				
	<b>Per PGG:</b>				
	No repair				
	<b>Defense Location:</b>				
	<b>Per PGG:</b>				
	No repair				
2.0a	<b>Subtotal by issue</b>				<b>0</b>
	<b>Allegation:</b>				
2.0b	Non-Compliant Longitudinal Slope of Sidewalks				
	<b>Defense Repair Scope:</b>				
	Included in Civil 2.0A				
	<b>Defense Location:</b>				
	Included in Civil 2.0A				
2.0b	<b>Subtotal by issue</b>				<b>0</b>
	<b>Allegation:</b>				
2.0c	Non-Compliant Landings				
	<b>Defense Repair Scope:</b>				
	Included in Civil 2.0A				
	<b>Defense Location:</b>				
	Included in Civil 2.0A				
2.0c	<b>Subtotal by issue</b>				<b>0</b>
<b>2.0</b>	<b>Concrete Flatwork - SUBTOTAL</b>				<b>0</b>
<b>II</b>	<b>SUBTOTAL - Civil</b>				<b>0</b>

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III	<b>BUILDING ENVELOPE (Costs and repairs are based upon SBSA, LLC, A Charles Taylor Company's Construction and Design Compliance Report, dated 06/23/2021, and Supplemental Construction and Design Compliance Report, dated 10/14/2021.)</b>				
<b>1.0 Facade (Exterior Cladding and Sealants) Type 1 - Stucco</b>					
<p><b>Allegation:</b> 1.0a Missing Weep Mechanism in Stucco</p> <p><b>Defense Repair Scope:</b> At all wall-to-soffit locations, remove a 12-inch strip of stucco from the wall and soffit and install weeps integrated with WRB before restoring the stucco system. The repairs should be painted to match the adjacent finishes.</p> <p>Weeps total lineal footage = 4,016 LF</p> <p><b>Defense Location:</b> All wall-to-soffit locations.</p>					
	Access repair, setup and layout work	Bldg	825.00	5	4,125.00
	Protect adjacent surfaces, stock materials	Bldg	1,150.00	5	5,750.00
	Set-up and tear down scaffolding to access repair area (accept plaintiff cost)	Sf	2.50	57,696	144,240.00
	Break-out, remove 12" strip of stucco at wall to soffits, haul to dumpster	Sf	3.30	4,016	13,252.80
	Install new soffit drip screed and WRB where stucco was removed	Lf	10.33	4,016	41,465.20
	Install new stucco foam insulation and stucco lath in a weatherboard manner	Sf	4.80	4,016	19,276.80
	Install new stucco cladding system where removed	Sf	10.40	4,016	41,766.40
	Apply elastomeric stucco paint to entire stucco plane to match adjacent surfaces, install backer rod and sealant at all joints	Sf	3.00	57,696	173,088.00
	Clean up, debris disposal, material handling	Bldg	1,200.00	4	4,800.00
	Protect adjacent surfaces, stock materials	Loc	412.50	1	412.50
	Clean area of repair to receive new weep drip system	Sf	0.67	1768	1,178.67
1.0a	<b>Subtotal by issue</b>				<b>449,355</b>
<p><b>Allegation:</b> 1.0b Non-Compliant WRB for Stucco System</p> <p><b>Defense Repair Scope:</b> No repair</p> <p><b>Defense Location:</b> No repair</p>					
1.0b	<b>Subtotal by issue</b>				<b>0</b>
<p><b>Allegation:</b> 1.0c Non-Compliant EPS Foam Board for Stucco System</p> <p><b>Defense Repair Scope:</b> No Repair</p> <p><b>Defense Location:</b> No Repair</p>					
1.0c	<b>Subtotal by issue</b>				<b>0</b>

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<p><b>Allegation:</b> 1.0d Non-Compliant Slope of Horizontal Stucco Surfaces</p> <p><b>Defense Repair Scope:</b> No Repair</p> <p><b>Defense Location:</b> No Repair</p>					
1.0d	<b>Subtotal by issue</b>			<b>0</b>	<b>0</b>
<p><b>Allegation:</b> 1.0e Deficient Self-Adhered Membrane under Horizontal Stucco System</p> <p><b>Defense Repair Scope:</b> No Repair</p> <p><b>Defense Location:</b> No Repair</p>					
1.0e	<b>Subtotal by issue</b>			<b>0</b>	<b>0</b>
<p><b>Allegation:</b> 1.0f Missing Control/Movement Joints</p> <p><b>Defense Repair Scope:</b> No Repair</p> <p><b>Defense Location:</b> No Repair</p>					
1.0f	<b>Subtotal by issue</b>			<b>0</b>	<b>0</b>
<b>1.0</b>	<b>Facade (Exterior Cladding and Sealants) Type 1 - Stucco- SUBTOTAL</b>				<b>449,355</b>

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<b>2.0 Moisture-Management System (Barriers, Flashings, Drainage, Etc.)</b>					
<p><b>Allegation:</b> 2.0a Missing Sheet Metal Flashing at Window Head</p> <p><b>Plaintiff Response / Occurrence:</b> Buildings A-D - 100%</p> <p><b>Plaintiff Repair Scope:</b> 1. Where sheet metal flashing is missing at fenestration heads, perform the repair described below.                      a. Install new pre-finished sheet metal flashings with 4-inch vertical legs and horizontal legs sloped 10- to 15-degrees as detailed on the architectural plans with hemmed drip edges.                      b. Apply sealant at ends of sheet metal flashing to provide end dams.                      c. Ensure all flashing joints and comers are sealed.                      d. Ensure that the WRB above is shingle lapped with the sheet metal flashing.                      2. Reinstall cladding per manufacturer instructions with a minimum 1/ 4-inch clearance between the bottom of cladding and the back of the sloped sheet metal flashing.</p> <p><b>Plaintiff Location:</b> Buildings A-D</p> <p><b>Defense Repair Scope:</b> No repair.</p> <p><b>Defense Location:</b> No repair.</p>					
2.0a	<b>Subtotal by issue</b>			<b>0</b>	
<p><b>Allegation:</b> 2.0b Non-Compliant Flashing to Stucco Interface</p> <p><b>Defense Repair Scope:</b> Remove existing deck coating over edge metal and remove edge metal flashing; adjust stucco to address intersection of deck and adjacent stucco surfaces; install new edge metal flashing and restore deck coating.</p> <p><b>Defense Location:</b> (18) Balcony decks.</p>					
	Access repair, setup and layout work	Loc	210.00	1	210.00
	Protect adjacent surfaces, stock materials	Loc	27.00	18	486.00
<b>At elevated decks, remove existing edge flashing and membrane/ coating to allow for stucco repairs described below</b>					
	In conjunction with stucco repairs, remove and replace existing edge flashing and membrane/coating as required.	Lf	22.50	456	10,261.14
	New deck coating	Sf	9.70	456	4,420.92
	Adjust stucco finish	Loc	132.50	18	2,385.00
	Clean up, debris disposal, material handling	Loc	27.50	18	495.00
2.0b	<b>Subtotal by issue</b>				<b>18,258</b>

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<p><b>Allegation:</b> 2.0c Non-Compliant Isolation Joints at Dissimilar Materials</p> <p><b>Defense Repair Scope:</b> Resurface finished coat at stairway where damaged / cracked.</p> <p><b>Defense Location:</b> CMU stairway</p>					
	Access repair, setup and layout work	Loc	96.25	1	96.25
	Protect adjacent surfaces, stock materials	Loc	125.00	1	125.00
<b>Stairway</b>					
	Repair finish coat where damaged/cracked and applying new finish texture coat to match as close as possible	Loc	560.00	2	1,120.00
	Clean up, debris disposal, material handling	Loc	63.75	1	63.75
2.0c	<b>Subtotal by issue</b>				<b>1,405</b>
<b>2.0</b>	<b>Moisture-Management System (Barriers, Flashings, Drainage, Etc.) - SUBTOTAL</b>				<b>19,663</b>

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<b>3.0 Roofing System Type 1 - Spray Polyurethane Foam (SPF)</b>					
<p><b>Allegation:</b> 3.0a Non-Compliant Slope to Roof Drains</p> <p><b>Defense Repair Scope:</b> Perform foam roof tune-up.</p> <p><b>Defense Location:</b> 18 roofs</p>					
<b>Roof tune-up at 18 roofs</b>					
	Preform a roof tune up - seal all vertical laps, remove/replace roof membrane and substrate at low spots and ridging location (slope to drain), seal all open or damaged penetrations	Loc	1,510.00	18	27,180.00
3.0a	<b>Subtotal by issue</b>				<b>27,180</b>
<b>3.0 Roofing System Type 1 - Spray Polyurethane Foam (SPF) - SUBTOTAL</b>					<b>27,180</b>
<b>4.0 Elevated Decks, Balconies, or Walkways</b>					
<p><b>Allegation:</b> 4.0a Non-Compliant Slope of Deck</p> <p><b>Defense Repair Scope:</b> No repairs.</p> <p>Reference 2.0B for deck repairs at stucco interface.</p> <p><b>Defense Location:</b> No repairs.</p>					
4.0a	<b>Subtotal by issue</b>				<b>0</b>
<b>4.0 Elevated Decks, Balconies, or Walkways - SUBTOTAL</b>					<b>0</b>
<b>III SUBTOTAL - BUILDING ENVELOPE</b>					<b>496,198</b>

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IV	<b>MISCELLANEOUS (Costs and repairs are based upon SBSA, LLC, A Charles Taylor Company's Construction and Design Compliance Report, dated 06/23/2021, and Supplemental Construction and Design Compliance Report, dated 10/14/2021.</b>				
1.0	<b>Pool Cabana</b>				
1.0a	<p><b>Allegation:</b> Ceiling Damage</p> <p><b>Defense Repair Scope:</b> Remove existing rivets as required. Install sheet metal flashing and new rivets as required (Estimated 22 LF). Crimp ends of standing seam roof. Remove and reinstall existing recessed light fixtures. Remove and replace damaged drywall where required. Add blocking where missing. Seal new drywall and paint entire ceiling to match existing.</p> <p><b>Defense Location:</b> Pool Structure</p>				
	Access repair, setup and layout work	Loc	145.83	1	145.83
	Protect adjacent surfaces, stock materials	Loc	105.00	1	105.00
	Remove rivets on standing seam metal roof	Lf	7.88	22	173.25
	Install new sheet metal flashing and rivet as required	Lf	22.25	22	489.50
	Crimp ends of standing seam roof	Lf	14.50	22	319.00
	Remove and reset electrical recessed light fixtures	Loc	142.50	4	570.00
	Remove and replace stained drywall, haul to dumpster	Sf	18.80	8	150.40
	Mud, tape and texture drywall to match adjacent surfaces	Sf	1.95	40	78.00
	Prime and paint drywall ceiling plane to plane (2 coats - full plane)	Sf	4.68	300	1,404.00
	Clean up, debris disposal, material handling	Loc	115.00	1	115.00
1.0a	<b>Subtotal by issue</b>				<b>3,550</b>
1.0	<b>Pool Cabana - SUBTOTAL</b>				<b>3,550</b>

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<b>2.0</b>	<b>Interior Door Trim Damage</b>				
<p><b>Allegation:</b> 2.0a Interior Door Trim Damage</p> <p><b>Defense Repair Scope:</b> Apply sealant at door jambs, prep and paint to match existing.</p> <p><b>Defense Location:</b> Roof access door/ Units 3106 and 3123</p>					
	Access repair, setup and layout work	Loc	36.67	2	73.33
	Protect adjacent surfaces, stock materials	Loc	25.00	2	50.00
	Prime and paint door jamb and baseboard to match existing, seal as required	Loc	180.00	2	360.00
	Clean up, debris disposal, material handling	Loc	33.60	2	67.20
6.02	<b>Subtotal by issue</b>				<b>551</b>
<b>2.0</b>	<b>Interior Door Trim Damage - SUBTOTAL</b>				<b>551</b>

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Ref	Description	UM	Unit Cost	Total Quantity	Total Cost
<b>3.0</b>	<b>Interior Repairs - Resultant Damage</b>				
3.0a	<p><b>Allegation:</b> Drywall staining</p> <p><b>Defense Repair Scope:</b> Remove and replace damaged drywall, seal, prime and paint affected surfaces to match.</p> <p><b>Defense Location:</b> Units 3104, 3110 and 3124, Unit 3106, Unit 3123</p>				
	Access repair, setup and layout work	Loc	119.58	5	597.92
	Protect adjacent surfaces, stock materials	Loc	71.25	5	356.25
	<b>Units 3104, 3110 and 3124</b>				
	Remove and reset electrical recessed light fixture and mechanical vent register adjacent to stain	Loc	142.50	6	855.00
	Remove and replace stained drywall, haul to dumpster	Sf	7.25	24	174.00
	Mud, tape and texture drywall to match adjacent surfaces	Sf	1.50	60	90.00
	Prime and paint drywall ceiling plane to plane (2 coats - full plane)	Sf	3.48	900	3,132.00
	<b>Unit 3106</b>				
	Remove and replace stained drywall, haul to dumpster	Sf	7.25	8	58.00
	Mud, tape and texture drywall to match adjacent surfaces	Sf	1.50	20	30.00
	Prime and paint drywall ceiling plane to plane (2 coats - full plane)	Sf	3.48	250	870.00
	Remove and replace swollen door jambs, haul to dumpster (Perform in conjunction with 2.0 #1)	Loc	60.75	1	60.75
	Prime and paint door jamb to match existing, seal as required	Loc	52.92	1	52.92
	<b>Unit 3106</b>				
	Remove and replace swollen door jambs, haul to dumpster (Perform in conjunction with 2.0 #1)	Loc	60.75	1	60.75
	Prime and paint door jamb to match existing, seal as required	Loc	52.92	1	52.92
	Clean up, debris disposal, material handling	Loc	140.00	5	700.00
3.0a	<b>Subtotal by issue</b>				<b>7,091</b>
<b>3.0</b>	<b>Interior Repairs - Resultant Damage - SUBTOTAL</b>				<b>7,091</b>
<b>IV</b>	<b>SUBTOTAL - MISCELLANEOUS</b>				<b>11,191</b>

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<b>Repair Total</b>					<b>507,389</b>
<b>General Conditions</b>				10%	<b>50,739</b>
<b>Subtotal</b>					<b>558,128</b>
	Contingency				55,813
	Overhead and Administration				55,813
	Contractor's Fee				55,813
	Permits, Bonds & Insurance				22,325
<b>Subtotal - Construction</b>					<b>747,892</b>
<b>PROJECT TOTAL</b>					<b>747,892</b>