

EXHIBIT 6

Gallery COA v K Hov at Gallery, LLC

BHA # 19-7096

Preliminary Defense Cost of Defense Scope Estimate

This document is provided for mediation purposes only and is protected under Arizona Rules of Evidence (Title 12)

Ref	Description	Um	Unit Cost	Total Quantity	Total Cost
ISSUE SUMMARY			Direct Const		Burdened Cost
I.	Structural		0		0
1.0	Compliance with Geotechnical Report		0		0
2.0	Lateral Force Resisting System (LFRS)		0		0
II.	Civil		0		0
1.0	Grading and Drainage		0		0
2.0	Concrete Flatwork		0		0
III.	Building Envelope		49,905		67,612
1.0	Façade - Exterior Cladding and Sealants Type 1 - Stucco		43,975		59,578
2.0	Moisture Management System (Barriers, Flashings, Drainage)		5,930		8,034
3.0	Roofing System Type 1 - Modified Bitumen Roll Roofing		0		0
4.0	Elevated Decks, Balconies, or Walkways		0		0
5.0	Pool Area		0		0
TOTAL			49,905		67,612

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I. Structural					
1.0	Allegation: Compliance with Geotechnical Report Summary: No repairs				
1.0	Subtotal by issue				0
2.0 A	Allegation: Lateral Force Resisting System (LFRS) Defense Repair: No repairs				
2.0 A	Subtotal by issue				0
I. Structural - SUBTOTAL					0

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Ref	Description	Um	Unit Cost	Total Quantity	Total Cost
II. Civil					
1.0 Grading & Drainage					
1.0 A	Allegation: Drainage Bounded by Concrete Flatwork Defense Repair: Per PGG report: No repairs				
1.0 A	Subtotal by issue				0
1.0 B	Allegation: Non-Compliant Management of Concentrated Flows Defense Repair: Per PGG report: No repairs				
1.0 B	Subtotal by issue				0
1.0 Grading and Drainage - SUBTOTAL					0

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Ref	Description	Um	Unit Cost	Total Quantity	Total Cost
2.0 Concrete Flatwork					
2.0 A	Allegation: Non-Compliant Cross-Slope of Sidewalks Defense Repair: Per PGG report: No repairs				
2.0 A	Subtotal by issue				0
2.0 B	Allegation: Non-Compliant Longitudinal Slope of Sidewalks Defense Repair: Per PGG report: No repairs				
2.0 B	Subtotal by issue				0
2.0 C	Allegation: Non-Compliant Landings Defense Repair: Per PGG report: No repairs				
2.0 C	Subtotal by issue				0
2.0 Concrete Flatwork - SUBTOTAL					0

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Ref	Description	Um	Unit Cost	Total Quantity	Total Cost
3.0 Streets and Roadways					
3.0 A	Allegation: Asphalt Pavement Distress				
	Defense Repair: Per PGG report: No repairs required.				
3.0 A	Subtotal by issue				0
3.0 Streets and Roadways - SUBTOTAL					0
Civil - Subtotal					0

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III. Building Envelope					
1.0 Façade - Exterior Cladding and Sealants Type 1 - Stucco					
<p>1.0 A Allegation: Missing Weep Mechanism in Stucco</p> <p>Defense Repair: Remove stucco at wall-to-soffit transitions, remove and replace damaged OSB sheathing as needed (assume 32 sf), install metal accessories, and patch the stucco to match the existing finish.</p>					
3-Plex					
	Access repair, access and stock materials, protect adjacent surfaces	Loc	56.50	1	56.50
	Set up and lay out work	Loc	176.00	1	176.00
	Remove 12" strip of stucco at wall-to-soffit transition	Sf	10.30	147	1,514.10
	Replace damaged OSB sheathing as needed	Sf	3.40	32	108.69
	Install new Amerimix stucco system; including WRB, weep screeds, insulation, etc.	Sf	11.69	147	1,718.43
	Prime and paint all repairs and blend into adjacent finishes	Sf	4.52	147	664.44
	Clean up, debris disposal, material handling	Loc	241.50	1	241.50
	Subtotal (one repair)				4,480
	Factor of occurrence			1	1
5-plex					
	Access repair, access and stock materials, protect adjacent surfaces	Loc	56.50	1	56.50
	Set up and lay out work	Loc	264.00	1	264.00
	Remove 12" strip of stucco at wall-to-soffit transition	Sf	10.30	267	2,750.10
	Replace damaged OSB sheathing as needed	Sf	3.40	64	217.39
	Install new Amerimix stucco system; including WRB, weep screeds, insulation, etc.	Sf	11.69	267	3,121.23
	Prime and paint all repairs and blend into adjacent finishes	Sf	4.52	267	1,206.84
	Clean up, debris disposal, material handling	Loc	283.00	1	283.00
	Subtotal (one repair)				7,899
	Factor of occurrence			5	5
1.0 A	Subtotal by issue				43,975
<p>1.0 B Allegation: Non-Compliant WRB for Stucco System</p> <p>Defense Repair: No repairs necessary.</p>					
1.0 B	Subtotal by issue				0
<p>1.0 C Allegation: Non-Compliant EPS Foam Board for Stucco System</p> <p>Defense Repair: No repairs necessary.</p>					
1.0 C	Subtotal by issue				0

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Ref	Description	Um	Unit Cost	Total Quantity	Total Cost
1.0 D	<p>Allegation: Non-Compliant Slope of Horizontal Stucco Surfaces</p> <p>Defense Repair: No repairs necessary.</p>				
1.0 D	Subtotal by issue				0
1.0 E	<p>Allegation: Deficient Self-Adhered Membrane under Horizontal Stucco System</p> <p>Defense Repair: No repairs necessary.</p>				
1.0 E	Subtotal by issue				0
1.0 F	<p>Allegation: Missing Control/Movement Joints</p> <p>Defense Repair: No repairs necessary.</p>				
1.0 F	Subtotal by issue				0
1.0	Façade - Exterior Cladding and Sealants Type 1 - Stucco - SUBTOTAL				43,975

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Ref	Description	Um	Unit Cost	Total Quantity	Total Cost
2.0 Moisture Management System (Barriers, Flashings, Drainage)					
2.0 A	Allegation: Missing Sheet Metal Flashing at Window Head Defense Repair: No repair is required.				
2.0 A	Subtotal by issue				0
2.0 B	Allegation: Non-Compliant Flashing to Stucco Interface Defense Repair: Where deck edge metal is buried in the stucco, extend the edge metal past the stucco face by installing new sheet metal under the existing drip edge. The new sheet metal should have a break to match the existing edge metal and be installed in a continuous bed of silicone sealant and then painted to match. (assume 10 decks total)				
	Access repair, protect adjacent surfaces	Loc	40.00	1	40.00
	Set up and lay out work	Loc	50.00	1	50.00
	Lift edge metal and remove loose stucco	Loc	100.00	1	100.00
	Insert new sheet metal edge flashing under existing to extend past stucco face	Loc	125.00	1	125.00
	Paint to match existing	Loc	100.00	1	100.00
	Clean up, debris disposal, material handling	Loc	50.00	1	50.00
	Subtotal (one balcony deck)				465
	Factor of occurrence			10	
2.0 B	Subtotal by issue				4,650
2.0 C	Allegation: Non-Compliant Isolation Joints at Dissimilar Materials Defense Repair: At two (2) locations, route groove in cold joint crack; fill with high-grade flexible sealant; paint repair to match adjacent finishes.				
	Access repair, protect adjacent surfaces	Loc	40.00	1	40.00
	Set up and lay out work	Loc	50.00	1	50.00
	Remove material at CMU cold joint	Loc	50.00	1	50.00
	Insert backer rod and fill joint with high-grade flexible sealant	Loc	200.00	1	200.00
	Paint to match existing	Loc	150.00	1	150.00
	Clean up, debris disposal, material handling	Loc	150.00	1	150.00
	Subtotal (one repair)				640
	Factor of occurrence			2	
2.0 C	Subtotal by issue				1,280
2.0 Moisture Management System (Barriers, Flashings, Drainage) - SUBTOTAL					5,930

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3.0 Roofing System Type 1 - Spray Polyurethane Foam (SPF)					
3.0A	Allegation: Non-Compliant Slope to Roof Drains				
	Defense Repair: No repair required.				
3.0 A	Subtotal by issue				0
3.0	Roofing System Type 1 - Modified Bitumen Roll Roofing - SUBTOTAL				0

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4.0 Elevated Decks, Balconies, or Walkways					
4.0 A	Allegation: Non-Compliant Slope of Deck Defense Repair: No repairs needed.				
4.0 A	Subtotal by issue				0
4.0 Elevated Decks, Balconies, or Walkways - SUBTOTAL					0

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5.0 Pool Area					
5.0	Allegation: Improper Wall & Ceiling Assembly and Fire Feature at Pool Defense Repair: No repairs needed.				
5.0	Subtotal by issue				0
5.0	Pool Area - SUBTOTAL				0
	Building Envelope - SUBTOTAL				49,905

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DIRECT COST TOTAL					49,905
	General Conditions				2,495
Subtotal					52,400
	Contingency				5,240
	Overhead and Administration				2,882
	Contractors Fee				5,764
	Permits, Bonds & Insurance				1,326
Construction Subtotal					67,612
Design and Monitoring Fees					0
Total Relocation					0
Project Total					67,612