

Exhibit A

1 **BURG SIMPSON ELDREDGE**
2 **HERSH & JARDINE P.C.**

3 8310 South Valley Highway, Suite 270
4 Englewood, CO 80112
5 Phone: (303) 792-5595
6 Fax: (303) 708-0527
7 Craig S. Nuss – 033839
8 Penny J. Manship – 034985
9 pmanship@burgsimpson.com

K Hov adv Gallery 2259 [DIW BJS MAC HJM]
06-23-21 1st Suppl Discl Stmt

No Docketing

6 *Attorneys for the Plaintiff*

7
8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF MARICOPA**

10 GALLERY COMMUNITY ASSOCIATION,
11 an Arizona non-profit corporation,

12 Plaintiff,

13 v.

14 K. HOVNANIAN AT GALLERY, LLC, an
15 Arizona limited liability company; K.
16 HOVNANIAN ARIZONA OPERATIONS,
17 LLC, an Arizona limited liability company; K.
18 HOVNANIAN DEVELOPMENTS OF
19 ARIZONA, INC., an Arizona corporation; K.
20 HOVNANIAN COMPANIES OF ARIZONA,
21 LLC, an Arizona limited liability company;
22 JOHN DOES I-X AND JANE DOES I-X,
23 WHITE CORPORATIONS I-X; BLACK
24 PARTNERSHIPS I-X; AND GRAY LIMITED
25 LIABILITY COMPANIES I-X,

26 Defendants.

27
28

K. HOVNANIAN AT GALLERY, LLC, an
Arizona limited liability company; K.
HOVNANIAN ARIZONA OPERATIONS,
LLC, an Arizona limited liability company; K.
HOVNANIAN DEVELOPMENTS OF
ARIZONA, INC., an Arizona corporation; K.

Case No. CV2020-008714

Assigned to Hon. Michael Kemp

**PLAINTIFF'S FIRST
SUPPLEMENTAL RULE 26.1
DISCLOSURE STATEMENT**

1 Nautilus Building Consultants, Inc.
2 8033 Vickers St.
3 San Diego, CA 82111
4 858-939-1539

5 Mr. Gustafson is a licensed contractor and architect in the State of Arizona and is
6 expected to testify regarding his education, experience, training and qualifications and as
7 to his cost of repair estimate. Mr. Gustafson will testify as to how the costs, including
8 time, materials, and labor, are calculated.

9 Mr. Gustafson will testify consistent with the findings in his reports disclosed in
10 this matter.

11 ***The Association discloses the following areas of expert testimony:***

12 ***(1) The nature and extent of the construction defects at issue in this case,***
13 ***including the investigation performed, the defective conditions observed,***
14 ***including resultant damage, the appropriate and relevant design and***
15 ***construction standards, and a repair methodology to remedy the defective***
16 ***construction and repair the resultant damage which includes removing and***
17 ***putting back certain non-defective materials.***

18 ***(2) The cost, including time, materials, and labor, of performing the***
19 ***repairs needed to remedy the construction defects at issue in this case.***

20
21
22 **VII. DAMAGES**

23 The Association's damages include the cost of repairing the defects, the cost of
24 repairing resultant damage caused by the defects, and the cost of the expert investigation.
25 The Association is also entitled to its attorneys' fees pursuant to A.R.S. § 12-341.01 and
26 the terms of the contract with K. Hovnanian at Gallery, LLC.
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IX. OTHER RELEVANT DOCUMENTS

At this time, the Association is not aware of other relevant documents which are not listed above.

RESPECTFULLY SUBMITTED this 23rd day of June, 2021.

BURG | SIMPSON | ELDREDGE | HERSH | JARDINE PC

By: /s/ Penny Manship

Craig S. Nuss, Esq.
Penny J. Manship, Esq.
8310 South Valley Highway, Suite 270
Englewood, CO 80112
(303) 792-5595
(303) 708-0527 (fax)
pmanship@burgsimpson.com
Attorneys for the Plaintiff

Exhibit B

1 **BURG SIMPSON ELDREDGE**
2 **HERSH & JARDINE P.C.**

3 8310 South Valley Highway, Suite 270
4 Englewood, CO 80112
5 Phone: (303) 792-5595
6 Fax: (303) 708-0527
7 Craig S. Nuss – 033839
8 Penny J. Manship – 034985
9 pmanship@burgsimpson.com

K Hov adv Gallery 2259 DIW BJS MAC HJM
07-23-21 Plt 2nd Suppl Discl Stmt
No Docketing

6 *Attorneys for the Plaintiff*

7
8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF MARICOPA**

10 GALLERY COMMUNITY ASSOCIATION,
11 an Arizona non-profit corporation,

12 Plaintiff,

13 v.

14 K. HOVNANIAN AT GALLERY, LLC, an
15 Arizona limited liability company; K.
16 HOVNANIAN ARIZONA OPERATIONS,
17 LLC, an Arizona limited liability company; K.
18 HOVNANIAN DEVELOPMENTS OF
19 ARIZONA, INC., an Arizona corporation; K.
20 HOVNANIAN COMPANIES OF ARIZONA,
21 LLC, an Arizona limited liability company;
22 JOHN DOES I-X AND JANE DOES I-X,
23 WHITE CORPORATIONS I-X; BLACK
24 PARTNERSHIPS I-X; AND GRAY LIMITED
25 LIABILITY COMPANIES I-X,

26 Defendants.

27 _____
28 K. HOVNANIAN AT GALLERY, LLC, an
 Arizona limited liability company; K.
 HOVNANIAN ARIZONA OPERATIONS,
 LLC, an Arizona limited liability company; K.
 HOVNANIAN DEVELOPMENTS OF
 ARIZONA, INC., an Arizona corporation; K.

Case No. CV2020-008714

Assigned to Hon. Michael Kemp

**PLAINTIFF'S SECOND
SUPPLEMENTAL RULE 26.1
DISCLOSURE STATEMENT**

1 The Association discloses the following areas of expert testimony:

2 (1) The nature and extent of the construction defects at issue in this case,
3 including the investigation performed, the defective conditions observed,
4 including resultant damage, the appropriate and relevant design and construction
5 standards, and a repair methodology to remedy the defective construction and
6 repair the resultant damage which includes removing and putting back certain non-
7 defective materials.

8 (2) The cost, including time, materials, and labor, of performing the repairs
9 needed to remedy the construction defects at issue in this case.

10 **VII. DAMAGES**

11 The Association's damages include the cost of repairing the defects, the cost of
12 repairing resultant damage caused by the defects, and the cost of the expert investigation.
13 The Association is also entitled to its attorneys' fees pursuant to A.R.S. § 12-341.01 and
14 the terms of the contract with K. Hovnanian at Gallery, LLC.

15 *The Association's damages also include the cost of repairing prior negligent*
16 *repairs by Defendants to the pool canopy drywall and the stucco at the top of the*
17 *adjacent stair walls located between the buildings, and the cost to repair the following*
18 *conditions: defective pool lights, defective pool fireplace, defective pedestrian gate,*
19 *defective entrance gate, dead trees and plants, defective irrigation, and standing water*
20 *at monument sign and rear of project.*

21 **VIII. TANGIBLE EVIDENCE**

22 1. Construction and Design Compliance Report ~~to be provided~~ by Ed
23 Fronapfel of SBSA, Inc., dated June 23, 2021 [GALLERY-SBSA_004952 – GALLERY-
24 SBSA_005159]

25 2. Cost of repair estimate to be provided by Steve Gustafson of Nautilus
26 Building Consultants [GALLERY-NAUTILUS_000010 – GALLERY-NBC_000022].

27 3. Curriculum Vitae of Edward Fronapfel of SBSA [GALLERY-
28 SBSA_004586 – GALLERY-SBSA_004627]

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By: /s/ Penny Manship
Craig S. Nuss, Esq.
Penny J. Manship, Esq.
8310 South Valley Highway, Suite 270
Englewood, CO 80112
(303) 792-5595
(303) 708-0527 (fax)
pmanship@burgsimpson.com
Attorneys for the Plaintiff

Exhibit C



October 14, 2021

Craig S. Nuss
Penny J. Manship
Burg Simpson Eldredge Hersh & Jardine PC
8310 South Valley Highway, #270
Englewood, Colorado 80112

Project Number: 219061.00 (030)
Project Name: Gallery
Location: 3104-3127 North 71st Street
Scottsdale, Arizona 85251

Subject: Supplemental Construction and Design Compliance Report

Dear Mr. Nuss and Ms. Manship:

PREAMBLE

Per your request, SBSA, LLC, A Charles Taylor Company (SBSA), provided a Construction and Design Compliance Report (SBSA CDC Report) dated June 23, 2021 to document findings based on observations of the buildings at the Gallery Townhomes site (Gallery) in Scottsdale, Arizona. This supplemental report provides additional findings based on a visual observation on August 23, 2021 and disclosed photographs.

This report is based on information provided and reviewed to date, and it is meant to provide engineering opinions regarding construction and engineering conditions as noted within this text. Should additional information be made available or unknown conditions discovered, SBSA retains the right to periodically revise and supplement this report accordingly.

As a part of this report, SBSA provides references, including quoted text and/or images, to substantiate our opinion. For clarity, SBSA italicizes quotes and, in the event that a quote includes already italicized text, that text will appear un-italicized. These italics are in no way intended to modify the intent of the quote but simply to aid the reader in discerning between text generated by SBSA and by outside sources. An original copy of all references is included as an attachment to this report.

PROJECT DOCUMENTATION REVIEWED

The following project-specific documentation was reviewed by SBSA as a part of its Scope of Work for this supplemental report:

- “Plaintiff’s First Supplemental Rule 26.1 Disclosure Statement,” Submitted June 23, 2021, Received from Burg Simpson Eldredge Hersh Jardine PC.
- Nautilus Site Inspection Documents and Photographs, Received from Burg Simpson Eldredge Hersh Jardine PC, July 22, 2021.
- Gallery Unit 3123 Photographs, Received from Burg Simpson Eldredge Hersh Jardine PC, August 3, 2021.
- Third Supplemental Disclosures, Bates Numbers GALLERY_006393 - GALLERY_006394, GALLERY-NBC_000471 - GALLERY-NBC_005033, GALLERY-WOLIN_3123-000001 - GALLERY-WOLIN_3123-000027, Received from Burg Simpson Eldredge Hersh Jardine PC, August 6, 2021.
- Fourth Supplemental Disclosures, Bates Numbers GALLERY_006395-GALLERY_00640, GALLERY-FISCHER_3106-000001 - GALLERY-FISCHER_3106-000012, GALLERY-JONES_3104-000013 - GALLERY-JONES_3104-000015, Received from Burg Simpson Eldredge Hersh Jardine PC, October 7, 2021.
- Gallery Unit 3112 Photographs, Received from Burg Simpson Eldredge Hersh Jardine PC, Bates Numbers GALLERY-CHANG 3112-000007 - GALLERY-CHANG 3112-000008, GALLERY-NBC 005052 - GALLERY-NBC 005063, October 13, 2021.
- Disclosed Photographs, Received from Burg Simpson Eldredge Hersh Jardine PC, Bates Numbers GALLERY-JONES_3104-000010 - GALLERY-JONES_3104-000012, GALLERY-NBC_004987 - GALLERY-NBC_004998, October 14, 2021.

FIELD OBSERVATIONS AND EVALUATIONS

C. BUILDING ENVELOPE

3. ROOFING SYSTEM TYPE 1 - SPRAY POLYURETHANE FOAM (SPF)

b. Roof Leaks

The homeowners have reported roof leaks near the roof drains at Units 3104 and 3106 of Building B. These leaks are in addition to the roof leaks previously reported by homeowners at Units 3110 and 3112 of Building B as referenced in SBSA's CDC Report.

The homeowner's insurance representative removed the ceiling gypsum sheathing to observe damage in the ceiling space in the third floor bedroom and laundry room of Unit 3106. The water-damaged gypsum sheathing was retained, covered with plastic, and stored in the homeowner's garage.

At Unit 3106, the preformed roof drain sump is supported over wood blocking and wood roof trusses along the perimeter. There are rusted fasteners and water stains on the roof framing and blocking at the perimeter of the drain sump, indicating water intrusion. The roof coating transitions from the SPF to the recessed drain sump. The drain sump is flexible and is susceptible to vertical movement when any downward force is applied. Some of the units have roof access and are used as roof decks for the occupants. The transition from the SPF to the perimeter of the roof drain sump had been temporarily repaired at the time of SBSA's observation. Nautilus applied water on the roof and allowed it to drain. SBSA did not observe water intrusion into the roof space below at the roof drain sump, and the temporary repair at the perimeter of the roof drain sump appears to have fixed the leaks. It is more likely than not that the waterproofing failed at the transition of the SPF to the roof drain sump.

At Unit 3104, the homeowner reported roof leaks at the third floor back bedroom and hallway and at the front door light switch. The roof leak at the back bedroom is near the roof drain sump above. The roof membrane has locations of cuts and holes. SBSA understands that the roof cuts and holes have been repaired by Nautilus. The front door light was not sealed and protruded from the stucco with openings around the perimeter. Nautilus applied sealant around the front entry light base as a temporary repair.

Also, the homeowner at Unit 3112 reported a roof leak near an AC unit. SBSA understands that the pad under the AC unit was repaired by the contractor. This repair failed because there are numerous openings and seams of the roof covering, allowing water intrusion. Nautilus provided a repair at the openings and seams of the AC unit pad.

Where roof leaks exist, the as-built condition falls short of the prescriptive requirements of the relevant codes, design, and industry standards and, therefore, the developer, contractor, and subcontractors who performed the work fell below the standard of care.

Example Photographs:



August 14, 2021, Homeowner-provided photograph, Unit 3106, upper floor laundry room, water leak near location of roof drain.



August 23, 2021, Disc OBS8, Photograph 54, JJF, Unit 3106, laundry room, portion of ceiling drywall removed by others.



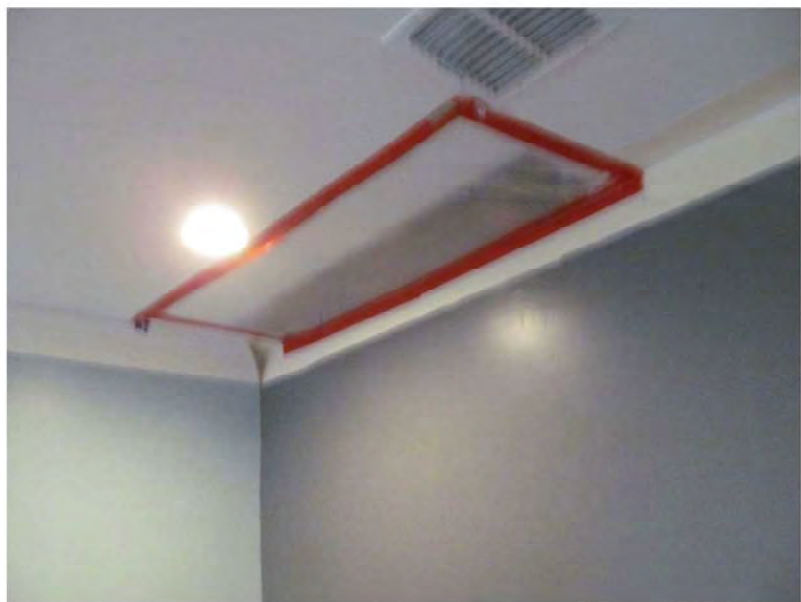
August 23, 2021, Disc OBS8, Photograph 48, JJF, Unit 3106, laundry room ceiling, water-damaged ceiling drywall around vent. Refer to photograph above.



August 23, 2021, Disc OBS8, Photograph 76, JJF, Unit 3106, laundry room, water-stained batt insulation.



August 23, 2021, Disc OBS8, Photograph 84, JJF, Unit 3106, laundry room, rusted nails and water-stained wood blocking and top chord of roof truss.



August 23, 2021, Disc OBS8, Photograph 60, JJF, Unit 3106, bedroom, portion of ceiling drywall removed by others.



August 23, 2021, Disc OBS8, Photograph 51, JJF, Unit 3106, bedroom ceiling, water-damaged ceiling drywall. Refer to photograph above.



August 23, 2021, Disc OBS8, Photograph 65, JJF, Unit 3106, bedroom, water-stained batt insulation.



August 23, 2021, Disc OBS8, Photograph 68, JJF, Unit 3106, bedroom, water-stained batt insulation under nail.



August 23, 2021, Disc OBS8, Photograph 70, JJF, Unit 3106, bedroom, water-stained wood blocking under perimeter edge of preformed drain pan farthest from parapet wall.



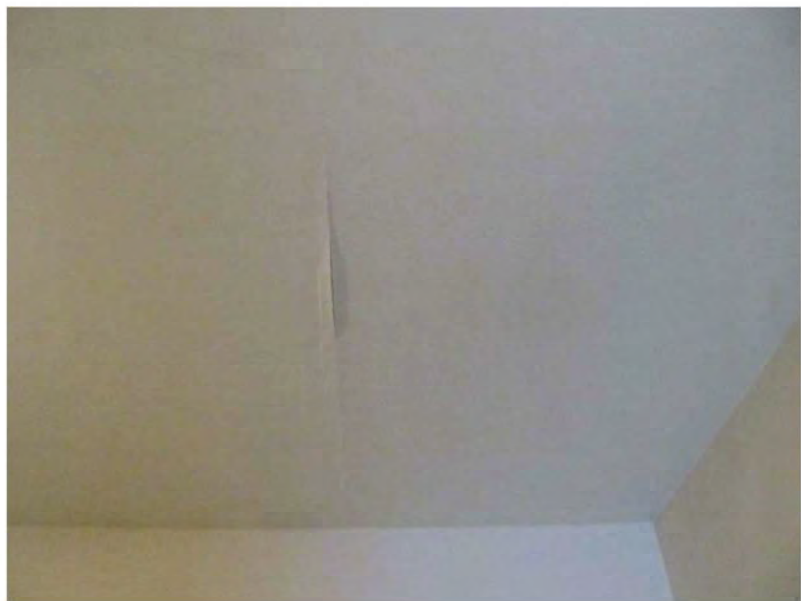
August 23, 2021, Disc OBS8, Photograph 72, JJF, Unit 3106, bedroom, water-stained wood blocking under perimeter edge of preformed drain sump nearest to parapet wall.



August 23, 2021, Disc OBS8, Photograph 86, JJF, Unit 3106, roof, temporary repair at perimeter of roof drain sump.



August 23, 2021, Disc OBS8, Photograph 88, JFF, Unit 3106, roof, temporary repair at perimeter of roof drain sump.



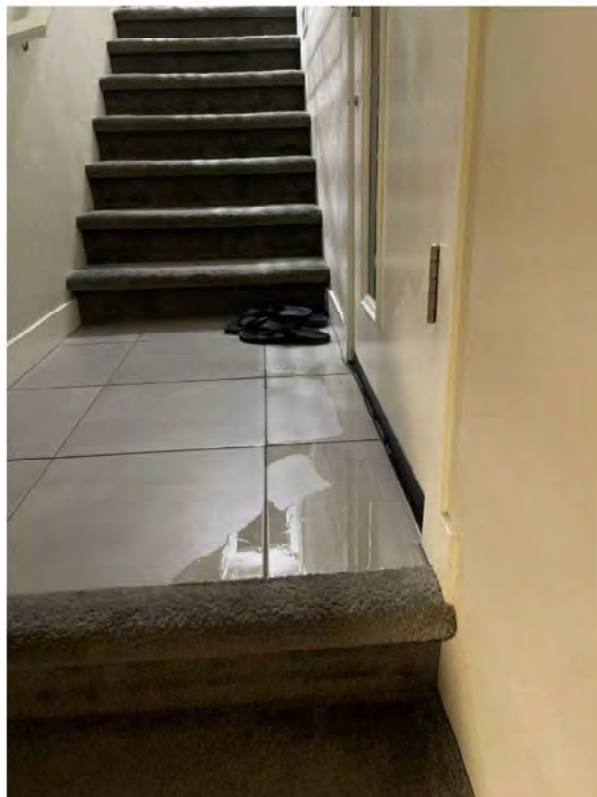
August 23, 2021, Disc OBS8, Photograph 107, JFF, Unit 3104, back bedroom, ceiling damage near location of roof drain above.



August 23, 2021, Disc OBS8, Photograph 108, JJJ, Unit 3104, hallway, ceiling stain and damage at bottom right of vent.



Burg Simpson provided photograph, Bates Number GALLERY-JONES_3104-000010, Unit 3104, water leak at front door light switch and hole in interior drywall.



Burg Simpson provided photograph, Bates Number GALLERY-JONES_3104-000012, Unit 3104, water leak at from front door light switch and hole in interior drywall. Water pooling on floor.



Nautilus-provided photograph, Bates Number GALLERY-NBC_004992, Unit 3104, light fixture protruding from stucco with openings around the perimeter.



Nautilus-provided photograph, Bates Number GALLERY-NBC_005052, Unit 3112, previous repair failed to seal openings in the roof membrane.



Nautilus-provided photograph, Bates Number GALLERY-NBC_005058, Unit 3112, previous repair failed to seal openings in the roof membrane.



Nautilus-provided photograph, Bates Number GALLERY-NBC_005059, Unit 3112, Nautilus roof repair.

Locations:

Roof leaks and ceiling damage were reported at Units 3104 and 3106 of Building B. Additional roof repairs at Unit 3112 at Building B.

D. MISCELLANEOUS

1. POOL CABANA

a. Ceiling Damage

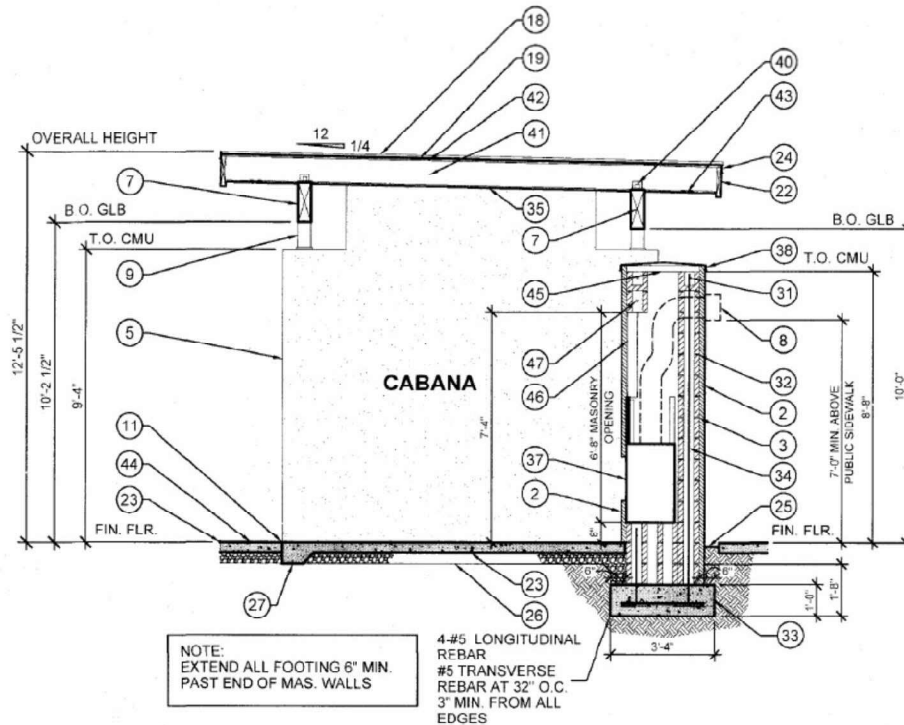
There are areas of the pool cabana ceiling that are cracked and have peeling paint. A previous repair by the original contractor was performed on the ceiling area near the area of the damaged ceiling per the disclosed Nautilus photographs.

The standing seam metal roof panels of the cabana are riveted at the overlap with the metal drip edge. At the standing seam metal roof panels and drip edge interface, there are openings and at one location there are no rivets. The openings allow water to enter between the drip edge and roof panels. The disclosed photographs of the previous repair show that the repair does not appear to have addressed the underlying issue that caused the damage.

Where roof leaks exist, the as-built condition falls short of the prescriptive requirements of the relevant codes, design, and industry standards and, therefore, the developer, contractor, and subcontractors who performed the work fell below the standard of care.

Applicable Code/Industry Standard References/Project-Specific Documents:

Felten Group, "Exterior Elevations and Building Sections," stamped April 6, 2016, Sheet A2.1 "Gallery Pool Cabana," Bates Number Gallery_000089, illustrates the following:

**BUILDING SECTION A**

1/4" = 1'-0"

- ⑱ STANDING SEAM METAL ROOF - CUSTOM BILT METALS (ESR-2048) OR EQUAL - (MATCH FREESTANDING RAMADA ROOF MATERIAL) - SLOPE 1/4" P.L.F.
- ⑲ ROOF UNDERLAYMENT PER MANUFACTURERS INSTALLATION SPECIFICATIONS FOR METAL ROOF SYSTEM
- ⑳ CMU THEME WALL - SEE LANDSCAPE PLANS
- ㉑ NOT USED
- ㉒ 2x12 FASCIA / BARGE BOARDS - COVER ALL EXPOSED SIDES GALV. METAL FINISHED TO MATCH STANDING SEAM METAL ROOF
- ㉓ 4" THICK REINFORCED CONCRETE SLAB W/ 6x6x10x10 W.W.M. OVER ABC PER GEOTECHNICAL REPORT - FINISH PER BUILDERS SPECIFICATIONS
- ㉔ GALV METAL CAP W/ DRIP EDGE - FINISH TO MATCH METAL ROOF SYSTEM
- ④⑩ SIMPSON HGAM10 AT EA. RAFTER TO BEAM. ONE SIDE ONLY W/ 4-1/4"x1-1/2" SDS SCREWS
- ④① 2x10 RAFTERS AT 16" O.C. MAX.
- ④② 15/32" MIN. APA RATED SHEATHING
- ④③ 2" WIDE CONTINUOUS SOFFIT VENT WITH MIN. 8.00 NET FREE VENTILATION AREA PER LINEAL FOOT

Example Photographs:



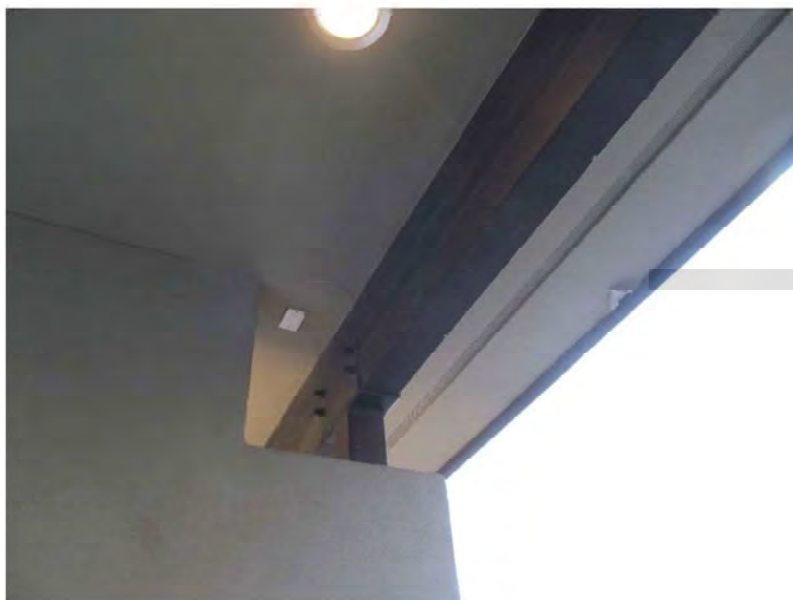
Nautilus-provided photograph, previous repair of pool cabana ceiling.



Nautilus-provided photograph, previous repair of pool cabana ceiling.



Nautilus-provided photograph, previous repair of pool cabana ceiling.



August 23, 2021, Disc OBS8, Photograph 2, JJF, pool cabana, peeling paint and cracked ceiling finish.



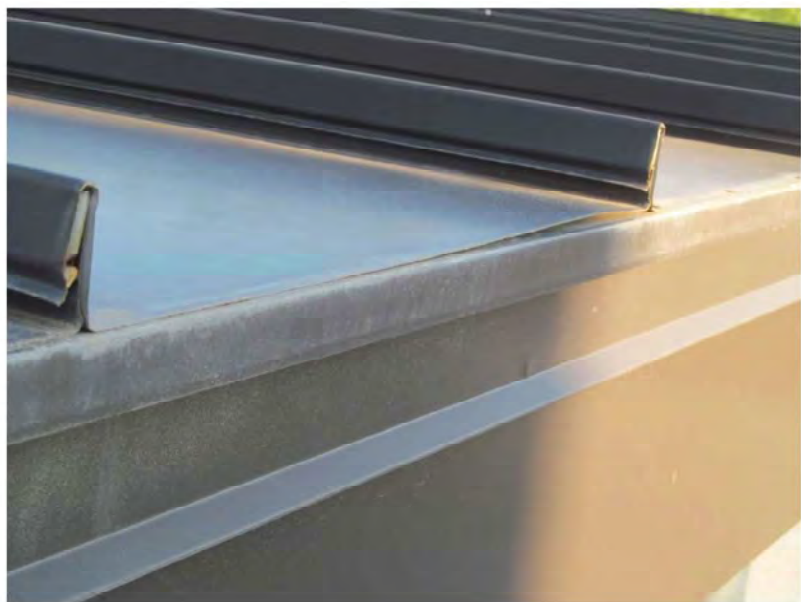
August 23, 2021, Disc OBS8, Photograph 3, JJF, pool cabana, cracked ceiling finish.



August 23, 2021, Disc OBS8, Photograph 10, JJF, pool cabana, peeling paint and cracked ceiling finish.



August 23, 2021, Disc OBS8, Photograph 10 (Enlarged), JJF, pool cabana, peeling paint and cracked ceiling finish. Zoomed in from photograph above.



August 23, 2021, Disc OBS8, Photograph 13, JJF, standing seam metal panel is bulged at location where it is not riveted at leading edge.



August 23, 2021, Disc OBS8, Photograph 9, JFF, pool cabana, cracked ceiling finish.



August 23, 2021, Disc OBS8, Photograph 16, JFF, pool cabana, unsealed edge.



August 23, 2021, Disc OBS8, Photograph 18, JJF, pool cabana, unsealed and bulging edge.

2. ROOF DECK PENTHOUSE DOOR

a. Interior Door Trim Damage

The homeowners at Unit 3106 reported that the penthouse door trim is damaged and there is water intrusion. The interior door trim extends below the tile floor finish and is swollen and paint is peeled.

At the intersection of the door jambs to the door threshold, the joints are unsealed. Water is allowed to enter at the openings and travel below the tile floor covering to the wood floor sheathing. The door trim is in contact with the water and has wicked up, resulting in peeled paint and swollen trim. Nautilus sprayed water on the door to determine if water leaked at the door jamb location. SBSA determined water had entered at the buried door trim below the tile floor covering.

At Unit 3123, the penthouse door trim is damaged and there is water intrusion. The interior door trim extends below the floor finish and is swollen, and paint is peeled.

Where interior door trim damage exists, the as-built condition falls short of the prescriptive requirements of the relevant codes, design, and industry standards and, therefore, the developer, contractor, and subcontractors who performed the work fell below the standard of care.

Example Photographs:



August 23, 2021, Disc OBS8, Photograph 23, JJF, Unit 3106, overview of roof access door.



August 23, 2021, Disc OBS8, Photograph 29, JJF, Unit 3106, roof penthouse door, unsealed joint at door threshold to jamb.



August 23, 2021, Disc OBS8, Photograph 27, JJF, Unit 3106, roof penthouse door, trim damage adjacent to door jamb.



August 23, 2021, Disc OBS8, Photograph 101, JJF, Unit 3106, roof penthouse door, water infiltration under floor tile.



August 23, 2021, Disc OBS8, Photograph 34, JFF, Unit 3106, roof penthouse door, unsealed joint at door threshold to jamb. Paint delamination consistent with wetting and drying.



August 23, 2021, Disc OBS8, Photograph 32, JFF, Unit 3106, roof penthouse door, trim damage adjacent to door jamb.



August 23, 2021, Disc OBS8, Photograph 188, JJF, Unit 3123, roof penthouse door, trim damage adjacent to door jamb.



August 23, 2021, Disc OBS8, Photograph 187, JJF, Unit 3123, roof penthouse door, unsealed joint at door threshold to jamb.



August 23, 2021, Disc OBS8, Photograph 180, JJF, Unit 3123, roof penthouse door, openings at door jamb.

Locations:

Interior door trim damage exists at Unit 3106 of Building B and Unit 3123 of Building C.

GENERAL RECOMMENDATIONS FOR REPAIR

All repairs shall be performed per building codes, manufacturer installation guidelines, and industry standards.

C. BUILDING ENVELOPE

3. ROOFING SYSTEM TYPE 1 - SPRAY POLYURETHANE FOAM (SPF)

b. Roof Leaks

- Prepare the existing waterproofing system for installation of reinforcing fabric at transition from the SPF and the perimeter of the roof drain sump at all units of Building B.
- Apply waterproofing coating per manufacturer's instructions.
- At the Unit 3106 AC unit pad, provide a permanent roof repair and coordinate with repairs for C.3.a in SBSA's CDC Report.
- At Unit 3104, reinstall front light to electrical box and apply a compliant sealant joint. Coordinate with repairs recommended in SBSA's CDC Report.

D. MISCELLANEOUS

1. POOL CABANA

a. Ceiling Damage

- Remove existing rivets at the downhill side of the roof.
- Install sheet metal flashing under the existing standing seam metal roof. Extend the leg of the sheet metal flashing under the standing seam metal panels and under the roof underlayment a minimum of 4-inches. Extend the edge of the sheet metal flashing 1/4-inch past the edge of the fascia. Color to match existing roof and sheet metal drip edge.
- Drill a pilot hole through the new sheet metal flashing at the existing rivet holes and apply heat-resistant silicone sealant in the existing rivet holes.
- Attach standing seam metal roof with screws and neoprene washers at the location of the existing rivets.
- Crimp the ends of the standing seam metal roofs.
- Fix damaged drywall ceiling and paint to match.

2. ROOF DECK PENTHOUSE DOOR

a. Interior Door Trim Damage

- Apply sealant at the interface of the door jambs to the door threshold at Units 3106 and 3123.

Limitations of Liability:

All comments made are based on conditions seen at the time of these visual observations and review of provided documentation. SBSA does not accept any responsibility for unknown or unknowable conditions within the existing site or structures. In addition, if the professional services of the consultant do not extend to the repair phase, then, by acceptance of this report, it is agreed that the owner will defend, indemnify, and hold harmless SBSA from any claim or suit whatsoever. SBSA agrees to be responsible for its own or its employees' negligent acts, errors, or omissions.

Sincerely,

SBSA, LLC
A Charles Taylor Company
Firm # 16794-0



Jeffrey J. Felderman, PE
Senior Vice President - Construction and Design Compliance



Edward L. Fronapfel, MSCE, PE, D-IBFES, DFE, CBIE, CFCC, CBCP, EDI, PTI1, HCR-R-1, F.NAFE,
F.ASCE
Chief Executive Officer

JJF:ELF:kn

Attachments: Observation Photographs
Observation Drawing Set, Sheets A1.02-A1.03, C2.01, C3.04, C3.06
References

K:\2019\21906100\030 - Reporting\01 Reports and Attachments\Supplemental CDC Report.docx