

# EXHIBIT D



CONSULTANTS INC.

CONSTRUCTION FORENSICS

SERVING CLIENTS NATIONWIDE

September 29, 2021

Invoice #62755

Rai & Barone, P.C.  
3033 N. Central Avenue, Suite 500  
Phoenix, AZ 85012  
Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772

**SERVICES RENDERED THROUGH August 31, 2021**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
4/26/2021	PDM Project Manager receive, review, and incorporate into database Plaintiff's complaint, demand letter, Renco's job file, etc. from Attorney.	0.60	60.00
5/4/2021	CEP Designated Expert telephone conference with Attorney to discuss job file and case strategy.	0.20	37.00
6/4/2021	PDM Project Manager receive, review, and incorporate into database Plaintiff's Initial Disclosure from Attorney.	0.50	50.00
7/22/2021	PDM Project Manager receive, review and incorporate into database, project documents including Plaintiff's First Supplemental Disclosure and photograph gallery from Attorney.	0.80	80.00
7/26/2021	PDM Project Manager receive, review and incorporate into database, project documents including Plaintiff's Second Supplemental Disclosure Statement from Attorney.	0.40	40.00
7/30/2021	CK Senior Construction Consultant review, sort, and organize 4450 Plaintiff photographs.	2.50	412.50
8/3/2021	DDB Senior Construction Consultant review and analyze plaintiffs 1st and 2nd disclosure statements, Renco 3rd party initial disclosure statement and develop preliminary opinions on roof issues and plaintiffs cost estimate.	2.50	412.50

		<u>Hours</u>	<u>Amount</u>
8/4/2021	DDB Senior Construction Consultant review and analyze plaintiffs visual inspection and destructive testing inspection photographs and categorize into individual unit files. (Gallery SBSA 000001-000611)	4.00	660.00
	CEP Designated Expert telephone conference with Attorney regarding recent emergency repairs and discuss potential visual inspection dates.	0.40	74.00
	DDB Senior Construction Consultant continue to review and analyze plaintiffs correspondence dated 7/23/21, plaintiffs 208 page preliminary report dated 6/23/21, plaintiffs defect matrix, plaintiffs observation drawings and photograph references, client subcontract, and clients statement of work in preparation of emergency repair visual inspections.	3.90	643.50
	CEP Designated Expert review and analyze client documents (work agreement between K Hovnanian and Renco and Nautilus Building site notes) and development of opinions in preparation for telephone conference with Attorney.	0.50	92.50
8/5/2021	DDB Senior Construction Consultant continue to review and analyze plaintiffs visual inspection and destructive testing inspection photographs and categorize into individual unit files. (Gallery SBSA 000612-003680)	4.30	709.50
8/6/2021	DDB Senior Construction Consultant continue to review and analyze plaintiffs visual inspection and destructive testing inspection photographs and categorize into individual unit files. (Gallery SBSA 003681-004500)	2.70	445.50
	DDB Senior Construction Consultant review and analyze numerous file materials and create the detailed document index. (plaintiff's 1st supplemental disclosure including documents bates #s Gallery-SBSA-00001-005160, correspondence from Attorney regarding emergency repairs with 8 color photographs, and client job file including Renco's initial (final) disclosure, and documents with bates #s Renco 00001-00245.)	3.20	528.00
8/9/2021	DDB Senior Construction Consultant continue to review and analyze numerous file materials and create the detailed document index. (plaintiff's Initial Disclosure,	1.70	280.50

		<u>Hours</u>	<u>Amount</u>
	Plaintiffs 2nd supplemental disclosure, and Nautilus Consulting job file, cost estimates, and work product, Bates #s Gallery 00001066-6392, Gallery-Jones_3104 000010-12, Gallery NBC 000001-000470.)		
8/9/2021	DDB Senior Construction Consultant continue to review and analyze numerous file materials and create the detailed document index. (plaintiff's Initial Disclosure, Plaintiffs 2nd supplemental disclosure, and Nautilus Consulting job file, cost estimates, and work product, Bates #s Gallery 00001066-6392, Gallery-Jones_3104 000010-12, Gallery NBC 000001-000470.)	2.10	346.50
8/10/2021	PDM Project Manager receive, review and incorporate into database, project documents including Plaintiffs' Expert Report and CORE from attorney.	0.40	40.00
8/13/2021	DDB Senior Construction Consultant travel to and from emergency repair inspection at 3123 N. 71st Street, Scottsdale, AZ. (Round trip travel to/from MC Phoenix office).	0.50	41.25
	DDB Senior Construction Consultant prepare materials and equipment for 8/13/21 emergency repair inspections.	0.60	99.00
	DDB Senior Construction Consultant attend emergency repair inspections at 3123 N. 71st Street, Scottsdale, AZ, units 3106, and 3123. Document observations with photographs and written field notes.	4.00	660.00
8/17/2021	DDB Senior Construction Consultant telephone conference with Attorney regarding plaintiff reports.	0.80	132.00
	DDB Senior Construction Consultant review and analyze key documents related to roof and deck issues to prepare for telephone call with Attorney.	1.40	231.00
	DDB Senior Construction Consultant review photographs and summarize field notes from emergency repair inspections on 8/13/21.	2.20	363.00
	PDM Project Manager receive, review and incorporate into database, project documents including Developer's Expert Reports.	0.60	60.00

			<u>Hours</u>	<u>Amount</u>
8/23/2021	KM	Senior Construction Consultant travel to/from emergency repair inspection at 3106 N. 71st Street, Scottsdale AZ. (Round trip travel to/from MC Phoenix office).	0.50	41.25
	KM	Senior Construction Consultant telephone conference with Attorney to discuss emergency repair inspection on 8/23/21.	0.20	33.00
	KM	Senior Construction Consultant prepare materials and equipment for 8/23/21 emergency repair inspection.	0.30	49.50
	KM	Senior Construction Consultant review and analyze file materials in preparation for emergency repair inspection.	1.20	198.00
	KM	Senior Construction Consultant review photographs and summarize field notes from 8/23/21 emergency repair inspection.	1.30	214.50
	KM	Senior Construction Consultant attend emergency repair inspection at 3106 N. 71st Street Scottsdale. Document observations with photographs and written field notes.	4.00	660.00
8/27/2021	DDB	Senior Construction Consultant continue to review and analyze numerous file materials and create the detailed document index. (plaintiffs 5th supplemental disclosure and associated documents, and defendant K Hovnanian 3rd party plaintiff 1st supplemental disclosure of documents and associated enclosures.)	1.30	214.50
	DDB	Senior Construction Consultant review and analyze key documents for further expert analysis. Documents include plaintiff's 5th supplemental disclosure and associated photographs, and K Hovnanian defense expert reports.	1.70	280.50
8/30/2021	KM	Senior Construction Consultant review and summarize inspection notes and photographs.	0.40	66.00

**Reimbursables:**

		<u>Qty</u>	<u>Amount</u>
8/13/2021	DDB Senior Construction Consultant travel mileage to/from emergency repair inspection at 3123 N. 71st Street, Scottsdale, AZ. (Round trip travel mileage to/from MC Phoenix office).	20	11.20
8/23/2021	KM Senior Construction Consultant travel mileage to/from emergency repair inspection at 3106 N. 71st Street, Scottsdale AZ. (Round trip travel to/from MC Phoenix office).	20	11.20
<b>Total Amount Due</b>		<b>51.70</b>	<b>\$8,277.90</b>

Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

2055 Corte del Nogal, Carlsbad, CA 92011-1412 Tel: (760) 930-9966 Fax: (760) 930-9974 www.mcconsultants.com

October 26, 2021

Invoice #64858

Rai & Barone, P.C.  
3033 N. Central Avenue, Suite 500  
Phoenix, AZ 85012  
Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772

**SERVICES RENDERED THROUGH September 30, 2021**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
9/14/2021	CEP Designated Expert prepare for and attend telephone conference with Attorney to discuss allegations and observations from visual inspections.	1.40	259.00
	CEP Designated Expert review and analyze client documents (GALLERY-NBC_000010- Cost of Repair, SBSA Construction Design and Compliance Report 6.23.21, KHOV00001701, KHOV00001683) and develop opinions.	2.90	536.50
	JH Designated Expert attend telephone conference with Experts and Attorneys regarding file status.	0.50	92.50
9/15/2021	CEP Designated Expert telephone conference with Attorney to discuss KHOV expert report and Cost of Repair Estimate.	0.50	92.50
<b>Total Amount Due</b>		<b>5.30</b>	<b>\$980.50</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

November 24, 2021

Invoice #65341

Rai & Barone, P.C.  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH October 31, 2021**

**J.N. 21-557**

			<u>Hours</u>	<u>Amount</u>
10/5/2021	CEP	Designated Expert prepare materials and equipment for 10/6/21 visual inspection.	0.70	129.50
10/6/2021	CEP	Designated Expert travel to and from visual inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel from MC Phoenix office)	0.60	55.50
	CEP	Designated Expert attend visual inspection at 3124 N. 71st Street, Scottsdale, AZ. Document observations with photographs and written field notes.	3.50	647.50
10/7/2021	CEP	Designated Expert review photographs and summarize field notes from 10/6/21 visual inspection.	0.70	129.50
10/11/2021	PDM	Project Manager receive, review and incorporate into database, project documents including Defendant's Initial Disclosure and 1st Supplemental Disclosure, and Plaintiffs' 2nd, 3rd, 4th, 5th, 6th and 7th Supplemental Disclosures from attorney.	1.10	110.00
10/12/2021	PDM	Project Manager prepare initial draft Defect Issue Report and incorporate plaintiff raw data including defect issues and locations observed.	0.80	80.00
10/13/2021	SFM	Senior Construction Consultant continue to prepare defect issue report and incorporate plaintiff raw data including defect issues, locations observed and method.	2.80	462.00

11/24/2021

			<u>Hours</u>	<u>Amount</u>
10/26/2021	CK	Senior Construction Consultant review and analyze Plaintiff report in preparation of MC Defect Issue Report.	1.40	231.00
	CK	Senior Construction Consultant review and analyze Plaintiff photographs and cost of repair in preparation of MC Defect Issue Report.	3.30	544.50
10/27/2021	CK	Senior Construction Consultant review and analyze Defense documents including Expert report and photographs in preparation of MC Defect Issue Report.	2.40	396.00
10/28/2021	CK	Senior Construction Consultant review and analyze MC field notes and photographs in preparation of Defect Issue report.	2.90	478.50
	CK	Senior Construction Consultant review and analyze case documents and begin preparation of Defect Issue Report (incorporate introduction, property description, and project information sections).	7.20	1,188.00

**Reimbursables:**

			<u>Qty</u>	
10/6/2021	CEP	Designated Expert mileage to and from visual inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel from MC Phoenix office).	20	11.20

**Total Amount Due****27.40****\$4,463.20****Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412****MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

2055 Corte del Nogal, Carlsbad, CA 92011-1412 Tel: (760) 930-9966 Fax: (760) 930-9974 www.mcconsultants.com

December 27, 2021

Invoice #65940

Rai & Barone, P.C.  
3033 N. Central Avenue, Suite 500  
Phoenix, AZ 85012  
Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772

**SERVICES RENDERED THROUGH November 30, 2021**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
11/9/2021	CEP Designated Expert review and analyze client documents (Pltfs 3rd Suppl Disclosure, Pltfs 4th Suppl Disclosure, Pltfs 6th Suppl Disclosure, Pltfs 7th Suppl Disclosure, Pltfs 8th Suppl Disclosure and 9th Suppl Discl 10.20.21) and develop opinions.	1.30	240.50
	PDM Project Manager receive, review and incorporate into database, project documents including Plaintiffs' 3rd, 4th, 6th, 7th, 8th and 9th Disclosure Statements from attorney.	1.60	160.00
11/10/2021	CEP Designated Expert review and revise initial Defect Issue Report.	0.40	74.00
11/11/2021	KM Senior Construction Consultant review and analyze file materials in preparation for site inspection.	2.20	363.00
	PDM Project Manager receive, review and incorporate into database, project documents including Plaintiffs' 10th Disclosure Statement and Cost of Repair Estimate from counsel.	0.60	60.00
11/12/2021	KM Senior Construction Consultant travel time to/from visual inspection at 3124 N. 71 Street, Scottsdale AZ. (Round trip travel to/from Phoenix Office).	1.50	123.75
	KM Senior Construction Consultant prepare materials and equipment for 11/12/21 visual inspection.	0.30	49.50
	KM Senior Construction Consultant attend visual inspections of roofs and decks, for Units 3116, 3112, 3104, 3113, 3115, 3118, 3125, 3122, 3121, 3109, 3110, 3105, 3111, 3117, 3127, and Main Pool Roof.	6.80	1,122.00

			<u>Hours</u>	<u>Amount</u>
Document observations with photographs and written field notes.				
11/15/2021	KM	Senior Construction Consultant review photographs and summarize field notes from 11/12/21 visual inspection.	2.20	363.00
11/22/2021	KM	Senior Construction Consultant telephone conference with Attorney and Insured to discuss visual inspection findings.	1.00	165.00
	CEP	Designated Expert receive, review and analyze visual inspection site information and develop opinions in support of upcoming telephone conference with Attorney.	0.50	92.50
	KM	Senior Construction Consultant review and analyze client documents (MC visual inspection photographs and notes) and develop opinions.	1.10	181.50
11/29/2021	PDM	Project Manager receive, review and incorporate into database, project documents including Plaintiff's Written Responses to RenCo discovery requests from attorney.	0.60	60.00
 <b>Reimbursables:</b>				
			<u>Qty</u>	
11/12/2021	KM	Senior Construction Consultant travel Mileage to/from visual inspection at 3124 N. 71 Street, Scottsdale AZ. (Round trip travel to/from Phoenix Office).	40	22.40
 <b>Total Amount Due</b>			<hr/> <b>20.10</b>	<hr/> <b>\$3,077.15</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

January 25, 2022

Invoice #66335

Rai & Barone, P.C.  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH December 31, 2021**

**J.N. 21-557**

			<u>Hours</u>	<u>Amount</u>
12/13/2021	CEP	Designated Expert prepare materials and equipment for 12/14/21 emergency repairs.	0.90	166.50
12/14/2021	CEP	Designated Expert attend emergency repairs/inspection at 3124 N. 71st Street, Scottsdale, AZ. Document observations with photographs and written field notes.	4.80	888.00
	CEP	Designated Expert travel to and from emergency repairs/inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel to/from MC Phoenix office).	0.50	46.25
12/16/2021	CEP	Designated Expert review photographs and summarize field notes from 12/14/21 visual inspection and roofing repairs.	1.80	333.00
	CEP	Designated Expert telephone conference with attorney regarding 12/14/21 visual inspection and roofing repairs.	0.70	129.50
12/17/2021	MBB	Cost Estimator review and analyze key documents related to site photographs and file documents and continue to develop opinions.	0.50	92.50
	MBB	Cost Estimator review and analyze roof photographs to develop quantity take-off for Cost of Repair Estimate.	0.50	92.50
	MBB	Cost Estimator prepare defense Cost of Repair Estimate, incorporating units and defense method of repair.	3.10	573.50

			<u>Hours</u>	<u>Amount</u>
12/22/2021	MBB	Cost Estimator review and analyze key documents related to subcontractor cost per contract and continue to develop opinions.	0.40	74.00
	MBB	Cost Estimator prepare defense Cost of Repair Estimate, incorporating allocations cost per client.	2.10	388.50
12/23/2021	CEP	Designated Expert telephone conference with attorney regarding cost analysis.	0.40	74.00
12/29/2021	CEP	Designated Expert review scope of repair estimate and allocation.	0.60	111.00
	CEP	Designated Expert telephone conference with Attorney to review allocation and answer claims professionals questions.	0.20	37.00
12/30/2021	CEP	Designated Expert on telephone standby for potential appears at mediation.	1.50	277.50

**Reimbursables:**

			<u>Qty</u>	
12/14/2021	CEP	Designated Expert travel mileage to/from emergency repairs/inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel mileage to/from MC Phoenix office).	21	11.76
<b>Total Amount Due</b>			<b>18.00</b>	<b>\$3,295.51</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

February 24, 2022

Invoice #66744

Rai & Barone, P.C.  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH January 31, 2022**

			<b>J.N. 21-557</b>	
			<u>Hours</u>	<u>Amount</u>
1/26/2022	CEP	Designated Expert attend emergency repairs/inspection at 3124 N. 71st Street, Scottsdale, AZ. Document observations with photographs and written field notes.	4.00	740.00
	CEP	Designated Expert prepare materials and equipment for emergency repair inspections.	1.00	185.00
	CEP	Designated Expert travel to and from emergency repairs inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel to/from MC Phoenix office).	0.50	46.25
1/27/2022	CK	Senior Construction Consultant review and finalize Report of Findings for further expert analysis from 1/26/22 site inspection in preparation for deposit and transmittal to Attorney.	1.50	247.50
	CEP	Designated Expert review photographs and summarize field notes from 1/26/22 emergency repairs.	0.80	148.00
	CEP	Designated Expert review and revise draft Report of Findings.	1.10	203.50
1/31/2022	CK	Senior Construction Consultant review and analyze new defense report of findings in preparation of revisions to Defect Issue Matrix (issue C.2.0 b).	3.40	561.00
	CK	Senior Construction Consultant revise Defect issue Report and report recommendations as requested by Attorney.	2.40	396.00

			<u>Hours</u>	<u>Amount</u>
1/31/2022	CK	Senior Construction Consultant prepare repair recommendations for MC Cost of Repair Estimate.	2.60	429.00
	CK	Senior Construction Consultant review and analyze and prepare revisions to Defect Issue Matrix based on new report.	1.50	247.50
	CK	Senior Construction Consultant review and analyze new defense report of findings and in preparation of revisions to Defect Issue Matrix (issue C. 3.0 a).	1.50	247.50
	CEP	Designated Expert complete final review and revisions to Defect Issue Report.	1.40	259.00
	MBB	Cost Estimator review and revise Cost of Repair Estimate in preparation for deposit and transmittal to attorney.	3.50	647.50

**Reimbursables:**

			<u>Qty</u>	
1/26/2022	CEP	Designated Expert travel mileage to/from emergency repairs/inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel mileage to/from MC Phoenix office).	21	12.29

<b>Total Amount Due</b>	<b>25.20</b>	<b>\$4,370.04</b>
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**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.



CONSULTANTS INC.

CONSTRUCTION FORENSICS

SERVING CLIENTS NATIONWIDE

March 25, 2022

Invoice #67147

Rai Duer Huff  
3033 N. Central Avenue, Suite 500  
Phoenix, AZ 85012  
Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772

**SERVICES RENDERED THROUGH February 28, 2022**

		<b>J.N. 21-557</b>	
		<u>Hours</u>	<u>Amount</u>
2/1/2022	MBB Cost Estimator review and revise Cost of Repair Estimate in preparation for deposit and transmittal to Attorney.	1.10	203.50
2/28/2022	PDM Project Manager receive, review and incorporate into database, project documents including Defense Supplemental Expert Reports from Attorney.	0.80	80.00
<b>Total Amount Due</b>		<b>1.90</b>	<b>\$283.50</b>

Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

2055 Corte del Nogal, Carlsbad, CA 92011-1412 Tel: (760) 930-9966 Fax: (760) 930-9974 www.mcconsultants.com

April 26, 2022

Invoice #67600

Rai Duer Huff  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH March 31, 2022**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
3/7/2022	DDB Senior Construction Consultant prepare materials and equipment for 3/9/22 visual inspection.	0.40	66.00
	DDB Senior Construction Consultant review and analyze file materials in preparation for site inspection.	0.60	99.00
3/9/2022	DDB Senior Construction Consultant travel time to/from visual inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip travel to/from MC Phoenix office).	0.50	41.25
	DDB Senior Construction Consultant attend visual inspection at Units 3124 and 3104. Document observations with photographs and written field notes.	1.70	280.50
3/10/2022	CEP Designated Expert telephone conference with Attorney to discuss BHA Defense Response Report dated 2/25/22.	0.50	92.50
	DDB Senior Construction Consultant review photographs and summarize field notes from 3/8/22 visual inspection.	1.80	297.00
	CEP Designated Expert review and analyze client documents (KHov-3rdSDS-022522, KHOV00001926-1948-BHAResponseReport-022522, KHOV00001949-1961-DSDC-022522, KHOV00001962-1964 Allocation-022422 and KHov-CumulativeExhibit A_3rdSDS-022522) and develop opinions.	0.70	129.50

		<u>Hours</u>	<u>Amount</u>
3/22/2022	CEP Designated Expert review General Contractors expert supplemental report in preparation for defense responses.	0.70	129.50
3/31/2022	CEP Designated Expert review and analyze client documents (General documents, building lay outs and reported leak information) in preparation for 4/1/2020 visual inspection and emergency repairs.	0.30	55.50

**Reimbursables:**

		<u>Qty</u>	
3/9/2022	DDB Senior Construction Consultant travel mileage to/from visual inspection at 3124 N. 71st Street, Scottsdale, AZ. (Round trip mileage to/from MC Phoenix office).	21	12.29

<b>Total Amount Due</b>	<b>7.20</b>	<b>\$1,203.04</b>
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**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

May 25, 2022

Invoice #68030

Rai Duer Huff  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH April 30, 2022**

		<b>J.N. 21-557</b>	
		<u>Hours</u>	<u>Amount</u>
4/1/2022	DDB Senior Construction Consultant travel time to/from emergency repair at 3124 North 71st Street, Scottsdale, Arizona. (Round trip travel to/from MC Arizona office).	0.50	41.25
	DDB Senior Construction Consultant review and analyze file materials in preparation for site inspection.	0.90	148.50
	DDB Senior Construction Consultant prepare materials and equipment for 4/1/22 Emergency Repair.	1.50	247.50
	DDB Senior Construction Consultant attend emergency repair at Unit 3109. Document observations with photographs and written field notes.	4.00	660.00
	CEP Designated Expert Telephone conference with project team to discuss observations from 4/1/2020 visual inspection and emergency repairs.	0.30	55.50
4/4/2022	DDB Senior Construction Consultant review photographs and summarize field notes from 4/1/22 emergency repair.	1.80	297.00
	SFM Senior Construction Consultant continue preparation of estimate comparison/analysis (Excelsior Restoration Inc - Dwelling Supplement & Excelsior Restoration Inc - Solar panel supplement).	3.30	544.50

**Reimbursables:**

	<u>Qty</u>	<u>Amount</u>
4/1/2022 DDB Senior Construction Consultant mileage to/from emergency repair at 3124 North 71st Street, Scottsdale, Arizona. (Round trip mileage to/from MC Arizona office).	20	11.70
<b>Total Amount Due</b>	<b>12.30</b>	<b>\$2,005.95</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

July 26, 2022

Invoice #68988

Rai Duer Huff  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH June 30, 2022**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
5/4/2022	PDM Project Manager receive, review and incorporate into database, project documents including Plaintiffs' 13th Supplemental Disclosure with Exhibits from attorney.	0.80	80.00
6/12/2022	CEP Designated Expert prepare materials and equipment for 6/13/2022 Roof Repairs	1.10	203.50
6/13/2022	CEP Designated Expert review photographs and summarize field notes from 6/13/22 Roofing Repairs.	1.70	314.50
	CEP Designated Expert attend Roof Repairs at Scottsdale, AZ. Document observations with photographs and written field notes.	8.00	1,480.00
	CEP Designated Expert travel to and from roof repairs at Scottsdale, AZ	0.40	37.00
6/14/2022	CEP Designated Expert travel to and from roof repairs at Scottsdale, AZ	0.40	37.00
	CEP Designated Expert attend Roof Repairs at Scottsdale, AZ. Document observations with photographs and written field notes.	8.00	1,480.00
	CEP Designated Expert review photographs and summarize field notes from 6/14/22 Roofing Repairs.	1.60	296.00
6/15/2022	CEP Designated Expert travel to and from roof repairs at Scottsdale, AZ	0.40	37.00

		<u>Hours</u>	<u>Amount</u>
6/15/2022	CEP Designated Expert attend Roof Repairs at Scottsdale, AZ. Document observations with photographs and written field notes.	4.00	740.00
6/16/2022	CEP Designated Expert review photographs and summarize field notes from 6/15/22 Roofing Repairs.	1.10	203.50

**Reimbursables:**

		<u>Qty</u>	
6/13/2022	CEP Designated Expert travel to and from roof repairs at Scottsdale, AZ	10	5.85
6/14/2022	CEP Designated Expert travel mileage to and from roof repairs at Scottsdale, AZ	10	5.85
6/15/2022	CEP Designated Expert travel to and from roof repairs at Scottsdale, AZ	10	5.85
<b>Total Amount Due</b>		<b>27.50</b>	<b>\$4,926.05</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

August 26, 2022

Invoice #69454

Rai Duer Huff  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH July 31, 2022**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
7/10/2022	CEP Designated Expert review and analyze client documents (general case documents, MC Photographs, MC Field Notes and reports) in preparation to be available telephonically for 7/11/22 Second Mediation.	1.20	222.00
7/15/2022	DDD Project Manager review and analyze numerous file materials and create a detailed document index.	0.80	80.00
7/18/2022	DDD Project Manager gather, organize, and prepare information for MC job file production.	1.40	140.00
7/20/2022	DDD Project Manager continue review and analyze of numerous file materials and preparation of detailed document index.	2.40	240.00
7/21/2022	DDD Project Manager continue to gather, organize, and prepare information for MC job file production.	0.60	60.00
7/22/2022	DDD Project Manager continue to gather, organize and prepare information for MC job file production.	1.40	140.00
	DDD Project Manager continue review and analysis of numerous file materials and preparation of detailed document index.	1.80	180.00
7/25/2022	DDD Project Manager continue review and analyze of numerous file materials and create a detailed document index.	3.40	340.00
7/27/2022	DDD Project Manager finalize job file and transmit to counsel.	0.40	40.00

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GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772  
8/26/2022

	<u>13.40</u>	<u>Amount</u>
<b>Total Amount Due</b>	<b>13.40</b>	<b>\$1,442.00</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

2055 Corte del Nogal, Carlsbad, CA 92011-1412 Tel: (760) 930-9966 Fax: (760) 930-9974 [www.mcconsultants.com](http://www.mcconsultants.com)

September 28, 2022

Invoice #69922

Rai Duer Huff  
 3033 N. Central Avenue, Suite 500  
 Phoenix, AZ 85012  
 Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
 YOUR CLIENT: RENCO, LLC  
 CLAIM #: 46772

**SERVICES RENDERED THROUGH August 31, 2022**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
8/12/2022	CEP Designated Expert review and analyze file materials, including MC Report and MC photographs for deposition.	0.70	129.50
	DDD Project Manager receive correspondence from counsel, review and incorporate into database, project documents including Plaintiff's 15th and 16th Supplemental Disclosure Responses and update general case information.	0.20	20.00
	DDD Project Manager receive, review and incorporate into database, project documents including bates labeled production documents from Plaintiff's 14th, 15th and 16th supplemental disclosures.	0.40	40.00
	DDD Project Manager review and analyze file materials and update detailed document index.	2.10	210.00
8/15/2022	CK Senior Construction Consultant begin analysis of case documents relevant for deposition by MC expert.	1.20	198.00
	CK Senior Construction Consultant review and analyze case documents and begin preparation for deposition materials. Assemble introductory documents and update new information.	2.40	396.00
8/16/2022	CK Senior Construction Consultant review and analyze case documents and continue preparation for deposition materials. Incorporate backup and other documents into deposition binder for issues 2a, b, and c.	3.50	577.50

9/28/2022

			<u>Hours</u>	<u>Amount</u>
8/16/2022	CK	Senior Construction Consultant review and analyze case documents and continue preparation for deposition materials. Incorporate new issues from Developer experts regarding interior repairs and pool cabana including repair costs.	4.50	742.50
8/17/2022	CK	Senior Construction Consultant review and analyze case documents and continue preparation for deposition materials. Incorporate backup and other documents and photographs into deposition binder for issues 4a.	2.50	412.50
	CK	Senior Construction Consultant review and analyze case documents and continue preparation for deposition materials. Incorporate backup and other documents and photographs into deposition binder for issues 3a.	4.40	726.00
8/19/2022	CEP	Designated Expert review and analyze file materials for upcoming deposition.	1.50	277.50
8/25/2022	CEP	Designated Expert continue to prepare for 9/2/22 deposition.	2.60	481.00
8/26/2022	DDD	Project Manager review and analyze additional file materials and update detailed document index.	0.50	50.00
	CEP	Designated Expert prepare for and participate in telephone conference with attorney regarding 9/2/2022 deposition.	1.20	222.00
	CEP	Designated Expert continue to prepare for 9/2/22 deposition.	1.30	240.50
8/27/2022	CEP	Designated Expert review and analyze MC photographs for upcoming deposition.	2.10	388.50
8/29/2022	CEP	Designated Expert continue to prepare for 9/2/22 deposition.	1.90	351.50
8/31/2022	CK	Senior Construction Consultant review cost of repair and responses in preparation of expert deposition.	3.50	577.50
	CEP	Designated Expert continue to prepare for 9/2/22 deposition.	5.60	1,036.00

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GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772  
9/28/2022

	<u>42.10</u>	<u>Amount</u>
<b>Total Amount Due</b>		<b>\$7,076.50</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.

2055 Corte del Nogal, Carlsbad, CA 92011-1412 Tel: (760) 930-9966 Fax: (760) 930-9974 www.mcconsultants.com

October 26, 2022

Invoice #70463

Rai Duer Huff  
3033 N. Central Avenue, Suite 500  
Phoenix, AZ 85012  
Shannon Guerrero Huff

RE: GALLERY COMMUNITY ASSOCIATION V. K. HOVNANIAN AT GALLERY, LLC  
YOUR CLIENT: RENCO, LLC  
CLAIM #: 46772

**SERVICES RENDERED THROUGH September 30, 2022**

**J.N. 21-557**

		<u>Hours</u>	<u>Amount</u>
9/1/2022	CEP Designated Expert telephone conference with attorney to discuss 9/2/2022 deposition.	0.90	166.50
	CEP Designated Expert review and analyze file materials and prepare for deposition.	6.70	1,239.50
9/2/2022	CEP Designated Expert attend deposition.	0.90	166.50
	CEP Designated Expert continue to review file materials and prepare for deposition.	0.90	166.50
<b>Total Amount Due</b>		<b>9.40</b>	<b>\$1,739.00</b>

**Remit payment to MC Consultants, Inc. 2055 Corte Del Nogal, Carlsbad, CA 92011-1412**

**MC CONSULTANTS EMPLOYER ID #33-0356700**

A \$25.00 fee will be assessed for all return items.

Accounts over 30 days old may be subject to finance charge.