

EXHIBIT E

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALIFORNIA, CA 91730

TEL 90965452

FAX 909627

EIN 33-0697492

INVOICE #: 6950-AProject: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 12/22/21

ATT: Osama H. Tokko

The following invoice is for services rendered between November 1, 2021 and November 30, 2021 in connection with the above-referenced case.

Total Due This Invoice:**\$9,671.80**

Date	Action	Time
11/02/21	Correspond with counsel regarding retention. Analyze and evaluate case background information.	0.20
11/05/21	Correspond with counsel regarding availability for 11/12/21 visual inspections.	0.30
11/08/21	Review and process correspondence from counsel regarding 11/12/21 visual inspection.	0.20
11/09/21	Review and process plaintiff 1st - 9th supplemental disclosures received 11/09/21. Establish organizational protocol. Update document index. Bates #GALLERY_001066-6442, GALLERY-CHANG_3112-000007-8, GALLERY-FISCHER_3106-000001-22, GALLERY-JONES_3104-000010-15, GALLERY-SLUSARZ-000026, GALLERY-WOLIN_3123-000001-27, GALLERY-NBC_000001-5075	6.40
11/10/21	Analyze and evaluate plaintiff expert SBSA Supplemental Construction and Design Compliance Report dated 10/14/21, defect matrix, repair drawings, reference materials, and observation photographs. Correlate with plaintiff cost estimate.	3.80

continued

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 90965452

FAX 90965277

EIN 33-0697492

INVOICE #: 6950-A-1Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 12/22/21

ATT: **Amad H. Tokko**

Date	Action	Time
	Analyze and evaluate plaintiff expert Nautilus Building Consultants temporary repair photographs and Revised Preliminary Estimate of Costs dated 11/08/21. Compare revised cost estimate with estimate dated 07/23/21.	2.50
11/17/21	Prepare HCCI inspection log summary.	0.30
	Analyze and evaluate HCCI photographs from 11/12/21 visual inspection.	2.30
11/22/21	Review and process developer/third-party plaintiff 2nd supplemental disclosures and discovery received 11/19/21. Update document index. Bates #KH0V00001922-1925	0.20
	Correlate HCCI inspection findings with plaintiff expert SBSA defect matrix, repair drawings, reference materials, and observation photographs.	2.70
11/23/21	Correspond with counsel to confirm 11/24/21 call.	0.20
11/24/21	Prepare for call with counsel. Confer with counsel regarding HCCI findings from 11/12/21 visual inspection.	2.00
	Review and identify pertinent documents in preparation for meeting with counsel. Meet and confer with legal team regarding HCCI analysis of plaintiff and developer reports, plaintiff cost to repair, and HCCI inspection findings.	1.80
11/30/21	Correspond with counsel regarding availability for call with developer expert.	0.20
	Total hours:	41.60

continued

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 909665-5452

FAX 909662-2777

EIN 33-0697492

INVOICE #: 6950-A-0Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: Desert Vista, Inc.

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 12/22/21

ATT: **Amad H. Tokko**

41.60 hours @ \$225.00/hour:

\$9,360.00

Miscellaneous Expenses

Round trip mileage @ \$0.56/mile	55	\$30.80
Photographs @ \$0.25 ea.	1,124	\$281.00
Copying @ \$0.20/page		\$0.00
Color copying @ \$0.88/page		\$0.00
Total Misc. Expenses		\$311.80

Total Hourly Expense:	\$9,360.00
Plus Miscellaneous Expenses:	\$311.80
Total Amount Due:	\$9,671.80

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CANTONCA, CA 91730

TEL 909665-5452

FAX 909662-2777

EIN 33-0697492

INVOICE #: 6950-A-2Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 01/19/22

ATT: **Amad H. Tokko**

The following invoice is for services rendered between December 1, 2021 and December 31, 2021 in connection with the above-referenced case.

Total Due This Invoice:**\$6,975.00**

Date	Action	Time
12/01/21	Review and process plaintiff discovery responses received 11/29/21. Update document index.	0.20
	Review and process additional plaintiff 1st supplemental disclosures received 11/23/21. Establish organizational protocol. Update document index. Bates #GALLERY-SBSA_000001-5160	1.10
12/02/21	Analyze and evaluate master subcontract and work agreements for Desert Vista, XO Windows, Liberty Constructors, Pro Tex, Renco Roofing, and Sargon Masonry. Bates #KHOV00000303-560, KHOV00000947-973	3.30
	Review and process correspondence from counsel regarding participation at 12/30/21 mediation. Correspond with counsel regarding availability to attend.	0.20

continued

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 90966-5452

FAX 90966-2777

EIN 33-0697492

INVOICE #: 6950-A-2Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 01/19/22

ATT: **Amad H. Tokko**

Date	Action	Time
12/03/21	Analyze and evaluate property management company AMCOR produced documents, including Porter Service Agreement, email correspondence, HOA documents, HOA Board Package, Gallery HOA financial reports, Gallery/Trestle Management Group Management Agreement, Gallery Income/Expense Statement, Activity Reports, Cash Disbursements, insurance documents, landscape proposal, photographs, Gallery board of directors meeting agenda, video, First Amendment to CC&Rs, Gallery Rules & Regulations, AMCOR Association Property Management Agreement, and Gallery Special Board Meeting Minutes.	4.20
	Review and process correspondence from counsel confirming 12/9/21 conference call.	0.10
12/06/21	Analyze and evaluate developer experts Peterson Geotechnical Group Civil and Geotechnical Engineering Evaluation dated 08/10/21 and Bert L. Howe & Assoc. Defense Response Report dated 08/11/21. Correlate and compare with plaintiff defect allegations.	3.50
	Analyze and evaluate project architectural plans. Identify architectural detail sheets.	0.50
	Research project site and county assessor's property information. Prepare HCCI Project Site Assessment components, including regional, aerial and oblique views of project site, assessor information, and historic aerial imagery.	3.20

continued

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0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 90965452

FA 909627

EIN 33-0697492

INVOICE # 6950-A-2Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 01/19/22

ATT: **Amad H. Tokko**

Date	Action	Time
12/09/21	Review and process correspondence from counsel regarding 12/09/21 conference call.	0.10
	Review and process developer expert cost to repair received 12/09/21. Update document index.	0.20
	Review and prepare HCCI case document index for counsel.	0.20
	Review case documents in preparation for meeting with developer experts. Confer with developer experts regarding alleged water intrusion associated with nonconformance with ESR – 3529.	2.70
12/10/21	Analyze and evaluate Amerimix Fiber Base Coat Stucco ICC – ES Report, ESR – 3529. Correlate plaintiff expert SBSA report dated 06/23/21 and destructive testing photographs with requirements of ESR – 3529.	2.30
12/13/21	Correspond with counsel regarding availability for call with carrier.	0.30
	Review and process plaintiff demand received 12/10/21. Update document index.	0.20
12/14/21	Analyze and evaluate plaintiff stucco related costs, plaintiff expert report, and developer cost to repair.	0.80
12/15/21	Meet and confer with legal team and adjuster in preparation for mediation.	1.40

continued

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 909654-5452

FA 909654-277

EIN 33-0697492

INVOICE #: 6950-A-2Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 01/19/22

ATT: Oamad H. Tokko

Date	Action	Time
12/21/21	Confer with counsel regarding request for HCCI estimate in preparation of 12/30/21 mediation.	0.20
	Analyze and evaluate developer expert BHA Preliminary Defense Cost of Defense Scope Estimate dated 08/22/21. Prepare HCCI Type ID cost to repair matrix, including repair descriptions, units of measurement, quantities and developer unit costs, for issues 1.0A, 1.0B, 1.0C, 1.0D, 1.0E, 1.0F, 2.0A, 2.0B, and 2.0C. Prepare primary and secondary formulas.	2.70
12/23/21	Confer with counsel regarding upcoming mediation.	0.10
12/27/21	Analyze and evaluate plaintiff expert Nautilus General Contractors Revised Preliminary Estimate of Costs dated 11/08/21. Prepare HCCI Type IIP cost to repair for issues 1.0A, 1.0B, 1.0C, 1.0D, 1.0E, 1.0F, 2.0A, 2.0B, and 2.0C. Prepare <u>primary and secondary formulas.</u>	3.50
	Total hours:	31.00
	31.00 hours @ \$225.00/hour:	\$6,975.00
Total Hourly Expense:		\$6,975.00
Plus Miscellaneous Expenses:		\$0.00
Total Amount Due:		\$6,975.00

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 909665-5452

FAX 909665-2777

EIN 33-0697492

INVOICE # 6950-A-3Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 02/14/22

ATT: **Moamad H. Tokko**

The following invoice is for services rendered between January 1, 2022 and January 31, 2022 in connection with the above-referenced case.

Total Due This Invoice:**\$6,424.10**

Date	Action	Time
01/06/22	Correspond with counsel regarding availability for conference call.	0.20
01/07/22	Confer with counsel regarding HCCI report preparation. (Two-Person Team)	0.60
	Review case documents. Prepare HCCI expert report introduction, project/case background, investigation process, and identification of case documents.	3.20
	Prepare HCCI expert report outline for plaintiff defect allegations attributed to Desert Vista, Inc. including: plaintiff and developer defect summaries, observations, standards, analysis of responsibility and repair recommendations for C.1.0A, C.1.0.B, C.1.0.C, C.1.0.D, C.1.0.E, and C.1.0.F.	4.50
	Confer with legal team regarding preparation of expert report.	0.30
01/10/22	Prepare repair recommendations for C.2.0a, C.2.0.b and C.2.0.c.	2.00
01/11/22	Analyze and evaluate HCCI, plaintiff, and developer inspection photographs. Identify and integrate exemplar photographs into HCCI expert report.	1.70

continued

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0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

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FAX 90966277

EIN 33-0697492

INVOICE # 6950-A-3Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 02/14/22

ATT: **Amad H. Tokko**

Date	Action	Time
	Integrate SBSA project plan excerpts into HCCI expert report for each defect as required.	1.00
01/17/22	Prepare HCCI's preliminary response to plaintiff defect allegations C.1.0.A missing weep mechanism in stucco, C.1.0.B non-compliant WRB for stucco system, C.1.0.C non-compliant EPS foam board for stucco system, and C.1.0.D non-compliant slope of horizontal stucco surfaces.	3.20
01/21/22	Prepare HCCI's preliminary response to plaintiff defect allegations: C.1.0.E deficient self-adhered membrane under horizontal stucco system, C.1.0.F missing control/movement joints, and C.2.0a missing sheet metal flashing at window head.	1.60
01/24/22	Analyze and evaluate case documents and HCCI case document index. Identify documents reviewed for inclusion in HCCI expert report investigation process.	1.40
	Confer with counsel regarding 01/26/22 emergency roof inspection.	0.10
	Prepare HCCI's preliminary response to plaintiff defect allegations: C.2.0b non-compliant flashing at stucco interface and C.2.0c non-compliant isolation joints at dissimilar materials.	1.50
	Identify and integrate HCCI exhibits and appendices into HCCI expert report.	0.70
	Perform final review, editing and formatting of HCCI draft expert report. Forward to counsel.	2.00

continued

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0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 909665-5452

FAX 909665-2777

EIN 33-0697492

INVOICE # 6950-A-3Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: Desert Vista, Inc.

Firm File #:

HCCI Project #: 6950-A

TO: Rai Barone, P.C.
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 02/14/22

ATT: Osama H. Tokko

Date	Action	Time						
01/26/22	Update HCCI preliminary draft expert report to include cost to repair data related to defect C.1.0.B.	0.30						
01/27/22	Confer with counsel regarding plaintiff and third-party document production.	0.20						
01/28/22	Analyze and evaluate plaintiff Complaint & Demand for Jury Trial dated 07/27/20, Third-Party Complaint dated 10/06/20, and Desert Vista's Answer to Third-Party Complaint dated 10/25/21.	0.50						
01/31/22	Review and prepare HCCI job file for deposit.	1.20						
	Finalize HCCI preliminary expert report and prepare HCCI inspection photographs for job file deposit.	2.30						
	Total hours:	28.50						
	28.50 hours @ \$225.00/hour:	\$6,412.50						
Miscellaneous Expenses								
	Round trip mileage @ \$0.56/mile	\$0.00						
	Photographs @ \$0.25 ea.	\$0.00						
	Copying @ \$0.20/page	58 \$11.60						
	Color copying @ \$0.88/page	\$0.00						
	Total Misc. Expenses	\$11.60						
<table border="1"> <tr> <td>Total Hourly Expense:</td> <td>\$6,412.50</td> </tr> <tr> <td>Plus Miscellaneous Expenses:</td> <td>\$11.60</td> </tr> <tr> <td>Total Amount Due:</td> <td>\$6,424.10</td> </tr> </table>			Total Hourly Expense:	\$6,412.50	Plus Miscellaneous Expenses:	\$11.60	Total Amount Due:	\$6,424.10
Total Hourly Expense:	\$6,412.50							
Plus Miscellaneous Expenses:	\$11.60							
Total Amount Due:	\$6,424.10							

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91370

TEL 909665452

FAX 90966277

EIN 33-0697492

INVOICE #: 6950-A-4Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Duer Huff
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 03/28/22

ATT: Osama H. Tokko
mtokko@rdhfirm.com

The following invoice is for services rendered between February 1, 2022 and February 28, 2022 in connection with the above-referenced case.

Total Due This Invoice:**\$2,340.00**

Date	Action	Time
02/01/22	Review and prepare discovery and document production received 01/28/22. Establish organizational protocol. Update document index.	2.80
	Analyze and evaluate The Management Trust (former Gallery property management company) documents, including project plans, Gallery HOA Walk with Builder and Board notes, invoices, Gallery General Ledger Trial Balance, Certificate of Disclosure, CC&Rs, Gallery HOA Meeting Minutes, proposals, K. Hovnanian counsel correspondence, Response to K. Hovnanian's 02/05/20 notice of Intent to Repair Notice, complaints, 10/10/18 Final Walk at Gallery, SSC Inspection Report, email correspondence, floor plans, Gallery HOA Balance Sheets, Gallery Cash Flow Specific Projections, photographs, 2017 Annual Meeting Agenda, Gallery HOA Executive Meeting Agenda, and Annual Income Statement. Bates #GALLERY_000001-499	3.40
	Analyze and evaluate Sargon Masonry Construction, LLC's document deposit, including Answer to Defendants/Third-Party Plaintiffs K. Hovnanian at Gallery, LLC, K. Hovnanian Arizona Operations, LLC, Hovnanian Developments of Arizona, Inc., and K. Hovnanian Companies of Arizona, LLC's Third-Party Complaint, invoices for repairs, Master Subcontract Agreement between Sargon and K. Hovnanian, billing and payment history, lot files, and master fence job pack. Bates #SMC000001-853	4.20
	Total hours:	10.40

continued

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 909665-5452

FAX 909662-2777

EIN 33-0697492

INVOICE #: 6950-A-4Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Duer Huff
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 03/28/22

ATT: **Moamad H. Tokko**
mtokko@rdhfirm.com

10.40 hours @ \$225.00/hour: \$2,340.00

Miscellaneous Expenses

Round trip mileage @ \$0.56/mile		\$0.00
Photographs @ \$0.25 ea.		\$0.00
Copying @ \$0.20/page		\$0.00
Color copying @ \$0.88/page		\$0.00
Total Misc. Expenses		\$0.00

Total Hourly Expense:	\$2,340.00
Plus Miscellaneous Expenses:	\$0.00
Total Amount Due:	\$2,340.00

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALABONGA, CA 91730

TEL 909665-5452

FAX 909662-2777

EIN 33-0697492

INVOICE #: 6950-A-5Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Duer Huff
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 04/30/22

ATT: Osama H. Tokko
mtokko@rdhfirm.com

The following invoice is for services rendered between February 1, 2022 and March 31, 2022 in connection with the above-referenced case.

Total Due This Invoice:**\$3,503.10**

Date	Action	Time
03/03/22	Analyze and evaluate project lot files for lots 009-018, including plans, invoices, and initial repairs. Bates #DV 000662 - 000957	4.30
	Review and process Defendant/Third-Party Plaintiff 3rd supplemental disclosures received 02/28/22. Update document index. Bates #KHOV00001926-1964	0.40
03/10/22	Correspond with counsel regarding availability for call to discuss developer disclosures.	0.20
03/14/22	Review and process correspondence from counsel confirming 03/15/22 call to discuss developer disclosures.	0.20
03/16/22	Analyze and evaluate developer supplemental report and cost to repair. Compare with HCCI expert report.	2.70
03/18/22	Review and process correspondence from counsel regarding rebuttal report deadline and Order Granting Stipulation to Amend Scheduling Order.	0.10
	Confer with counsel regarding preparation of supplemental expert report.	0.30
03/23/22	Review and process correspondence from counsel regarding rebuttal report deadline.	0.20

continued

HARRINGTON CONSTRUCTION CO., INC.**INVOICE**

0470 BOOTHILL BLVD., SUITE 230

RANCHO CALIFORNIA, CA 91730

TEL 909654-5452

FAX 909654-2777

EIN 33-0697492

INVOICE # 6950-A-5Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.Client: Desert Vista, Inc.

Firm File #:

HCCI Project #: 6950-A

TO: Rai Duer Huff
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 04/30/22

ATT: Osama H. Tokko
mtokko@rdhfirm.com

Date	Action	Time
03/23/22	Analyze and evaluate BHA Defense Response Report dated 02/25/22 and BHA Subcontractor Allocation Summary dated 02/25/22. Identify defects attributed to the work of Desert Vista.	0.60
	Prepare HCCI Rebuttal Report based on newly disclosed BHA reports to include updated BHA Defense Analysis & Repair Recommendations.	0.80
03/25/22	Continue preparation of HCCI Rebuttal Report to include updated BHA Defense Cost & Scope. Prepare HCCI's preliminary responses to BHA 02/25/22 reports for issues: C.1.0.A missing weep mechanism in stucco, C.1.0.B non-compliant WRB for stucco system, C.1.0.C non-compliant EPS foam board for stucco system, C.1.0.D non-compliant slope of horizontal stucco surfaces, C.1.0.E deficient self-adhered membrane under horizontal stucco system, C.1.0.F missing control/movement joints, C.2.0.a missing sheet metal flashing at window head, C.2.0.b non-compliant flashing in stucco interface, and C.2.0.c non-compliant isolation joints at dissimilar materials.	5.70
	Total hours:	15.50
	15.50 hours @ \$225.00/hour:	\$3,487.50
Miscellaneous Expenses		
	Round trip mileage @ \$0.56/mile	\$0.00
	Photographs @ \$0.25 ea.	\$0.00
	Copying @ \$0.20/page	78 \$15.60
	Color copying @ \$0.88/page	\$0.00
	Total Misc. Expenses	\$15.60

continued

HARRINGTON CONSTRUCTION CO., INC.

INVOICE

0470 BLOOTHILL BLVD., SUITE 230

RANCHO CALIFORNIA, CA 91730

TEL 909665-5452

FA 909662-270

EIN 33-0697492

INVOICE #: 6950-A-5

Project: Gallery Community Assoc. v. K. Hovnanian at Gallery, Inc.

Client: *Desert Vista, Inc.*

Firm File #:

HCCI Project #: 6950-A

TO: Rai Duer Huff
3033 N. Central Ave.
Suite 500
Phoenix, AZ 85012

Date: 04/30/22

ATT: **amad H. Tokko**
mtokko@rdhfirm.com

Total Hourly Expense:	\$3,487.50
Plus Miscellaneous Expenses:	\$15.60
Total Amount Due:	\$3,503.10



HARRINGTON CONSTRUCTION Co., Inc.

General Contractors • Consultants

INVOICE

Invoice # 6950-A-6

Date: 07/08/2022

10470 Foothill Blvd, Suite 230
Rancho Cucamonga, CA 91730
www.hccigroup.com

Marcus McGillivray
Rai Duer Huff

6950-A

Gallery Community Association v. K. Hovnanian at Gallery, Inc., et al.

Insured: Desert Vista, Inc.

Date	Action	Time	Rate	Total
05/03/2022	Analyze and evaluate The Management Trust (former property management company at The Gallery) documents including project plans, Gallery HOA Walk with Builder and Board notes, invoices, Gallery General Ledger Trial Balance, Certificate of Disclosure, CCIRs, Gallery HOA Meeting Minutes, proposals, K. Hovnanian counsel correspondence, Response to K. Hovnanian's February 5, 2020 notice of Intent to Repair Notice, complaints, 10/10/18 Final Walk at Gallery, SSC Inspection Report, email correspondence, floor plans, Gallery HOA Balance Sheets, The Gallery Cash Flow Specific Projections, photographs, 2017 Annual Meeting Agenda, Gallery HOA Executive Meeting Agenda and Annual Income Statement. Bates #GALLERY_000001-495.	3.70	\$225.00	\$832.50
05/04/2022	Review and process plaintiff 13th supplemental disclosures received 5/3/22. Update document index. Bates #GALLERY-NBC_005120 and GALLERY-SBSA_005399-5473.	0.50	\$225.00	\$112.50
05/10/2022	Analyze and evaluate Plaintiff's 13th Supplemental Disclosure Statement, including Nautilus Building Consultants Rebuttal Response to Defense Estimate dated 4/28/22, SBSA, Inc. Rebuttal Report of BHA dated 5/2/22. References to BHA Rebuttal Report and SBSA, Inc. Rebuttal Report of BSC dated 5/2/22.	1.80	\$225.00	\$405.00
05/11/2022	Analyze and evaluate K. Hovnanian's 3rd Supplemental Disclosure statement including Bert L. Howe Associates, Inc., Defense Response Report, Preliminary Defense Cost of Repair and Subcontractor Allocation Summary dated 2/25/22.	2.40	\$225.00	\$540.00
05/11/2022	Analyze and evaluate Gallery owners documents including email correspondence, photographs and videos.	1.30	\$225.00	\$292.50
05/12/2022	Analyze and evaluate Plaintiff's 13th Supplemental Disclosure Statement, including SBSA, Inc. Rebuttal Report of MC Consultants dated 5/2/22, SBSA, Inc. References to MC Consultants Report, SBSA, Inc. Rebuttal Report to PGG dated 5/2/22 and SBSA, Inc. Rebuttal Report to Shelton Consulting Group dated 5/2/22.	1.50	\$225.00	\$337.50
05/13/2022	Analyze and evaluate case documents, including: Analyze and evaluate The Management Trust (former property management company at The Gallery) documents including Gallery HOA Executive Meeting Agenda, annual meeting notices, Annual Minutes, Financial Summary, Gallery Statement of Revenues and Expenses, Executive Minutes, Gallery HOA Open Minutes, photographs and estimates. Bates#GALLERY_000500-939.	2.70	\$225.00	\$607.50
05/16/2022	Analyze and evaluate Nautilus Building Company observation photographs of units 3104, 3106, 3110 and 3123. Correlate photographs with plaintiff defect allegations.	2.30	\$225.00	\$517.50

05/17/2022	Correspond with counsel to schedule 5/19/22 call regarding plaintiff disclosures.	0.20	\$225.00	\$45.00
05/23/2022	Correspond with counsel regarding availability for deposition.	0.20	\$225.00	\$45.00
Quantity Subtotal				6.6
Total Hours:				6.6
Service and Expense Subtotal:				\$3,735.00
GRAND TOTAL:				\$3,735.00

**Please make all amounts payable to: Harrington Construction Co., Inc.
 EIN: 33-0697492**



HARRINGTON CONSTRUCTION Co., Inc.

General Contractors • Consultants

INVOICE

Invoice # 6950-A-7

Date: 08/23/2022

10470 Foothill Blvd, Suite 230
Rancho Cucamonga, CA 91730
www.hccigroup.com

Marcus McGillivray
Rai Duer Huff

6950-A

Gallery Community Association v. K. Hovnanian at Gallery, Inc., et al.

Insured: Desert Vista, Inc.

Date	Action	Time	Rate	Total
06/06/2022	Correspond with counsel regarding availability for 7/11/22 mediation.	0.20	\$225.00	\$45.00
06/16/2022	Analyze and evaluate HCCI billing records to determine future costs.	1.30	\$225.00	\$292.50
06/17/2022	Perform preliminary budget analysis for future costs associated with HCCI's review and response to <input type="checkbox"/> Hovnanian expert reports disclosed in February 2022. Confer with counsel regarding potential costs.	0.80	\$225.00	\$180.00
06/23/2022	Correspond with counsel regarding status of deposition.	0.10	\$225.00	\$22.50
06/23/2022	Correspond with counsel regarding availability for a pre- mediation call.	0.40	\$225.00	\$90.00
06/23/2022	Review and process correspondence from counsel confirming 6/29/22 pre-mediation call.	0.20	\$225.00	\$45.00
06/28/2022	In preparation for meeting with legal and insurance team analyze and evaluate plaintiff expert reports, including SBSA, Supplemental Construction and Design Compliance Report dated 10/14/21, Nautilus Building Consultant, Revised Preliminary Estimate of Costs dated 11/8/21 and HCCI expert report dated January 31, 2022 and inspection photographs.	3.40	\$225.00	\$765.00
06/29/2022	Confer with legal and insurance team regarding HCCI assessment of plaintiff's claims.	0.40	\$225.00	\$90.00
06/30/2022	Review Declaration of West Harrington on Behalf of Desert Vista, Inc. Execute and return to counsel.	0.60	\$225.00	\$135.00

Quantity Subtotal 7.4

Total Hours: 7.4

Service and Expense Subtotal: \$□,665.00

GRAND TOTAL: \$□,665.00

Please make all amounts payable to: Harrington Construction Co., Inc.
EIN: 33-0697492



HARRINGTON CONSTRUCTION Co., Inc.

General Contractors • Consultants

INVOICE

Invoice # 6950-A-8

Date: 09/06/2022

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Rancho Cucamonga, CA 91730
www.hccigroup.com

Marcus McGillivray
Rai Duer

6950-A

Gallery Community Association v. K. Hovnanian at Gallery, Inc., et al.

Insured: Desert Vista, Inc.

Date	Action	Time	Rate	Total
07/01/2022	Review HCCI invoicing and unbilled expenses to date. Prepare Statement of Costs to Date through 06/17/22. Forward to counsel.	0.60	\$225.00	\$135.00
07/05/2022	Correspond with counsel regarding status of 7/11/22 mediation.	0.10	\$225.00	\$22.50
07/06/2022	Review and process correspondence from counsel confirming 7/11/22 mediation.	0.20	\$225.00	\$45.00
07/06/2022	Review and process plaintiff 14th supplemental disclosure statement and document production received 7/6/22. Update document index. Bates #GALLERY-NBC_005124-5266, GALLERY-NBC-JOBFILE_000001-123, GALLERY-SBSA-JOBFILE_000001-652, GALLERY_006479-6487.	1.30	\$225.00	\$292.50
07/08/2022	Analyze and evaluate plaintiff expert SBSA, LLC job file documents including annotated photographs, SBSA Service Agreement, Supplemental Service Agreement, counsel correspondence, repair schedule, email correspondence, ProTex Geotechnical Investigation dated 3/18/15, elevation locations, SBSA invoices, project plans, Certificate of Occupancy, Haskin-Ryan Consultants Preliminary Drainage Design Report, inspection photographs, product specifications, Trinity Exterior Research job Design LLC Evaluation Report dated 6/16/16 and RDA Report Reserve Data Analysis.	4.60	\$225.00	\$1,035.00
07/12/2022	Analyze and evaluate plaintiff expert Nautilus Building Consultants job file documents including roof repair photographs at units 3104, 3109, 3112, and 3124 on June 13-15, 2022, Magic Touch HVAC Energy Testing estimate details, Nautilus job file information, Nautilus invoices, hand written notes, Arizona labor rates, stucco siding detail, Nautilus Project quantities - Plans and Quick Measure dated 11/8/21.	2.50	\$225.00	\$562.50
07/15/2022	Review and process correspondence from counsel regarding job file deadline and availability for deposition.	0.20	\$225.00	\$45.00
07/21/2022	Correspond with counsel regarding availability for deposition.	0.30	\$225.00	\$67.50
07/21/2022	Correspond with counsel regarding availability for a pre-deposition call.	0.20	\$225.00	\$45.00
07/21/2022	Analyze and evaluate approved building plans dated August 24, 2016. Compare as designed details with as built conditions and correlate with plaintiff defect allegations. Bates#HOV00001041-1168	3.40	\$225.00	\$765.00
07/29/2022	Review and prepare HCCI supplemental job file for deposit.	1.30	\$225.00	\$292.50

Quantity Subtotal 4.7

Total Hours:	□4.7
Service and Expense Subtotal:	\$3,307.50
GRAND TOTAL:	\$3,307.50

**Please make all amounts payable to: Harrington Construction Co., Inc.
EIN: 33-0697492**



HARRINGTON CONSTRUCTION Co., Inc.

General Contractors • Consultants

INVOICE

Invoice # 6950-A-9

Date: 09/28/2022

10470 Foothill Blvd, Suite 230
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www.hccigroup.com

Marcus McGillivray
Rai Duer

6950-A

Gallery Community Association v. K. Hovnanian at Gallery, Inc., et al.

Insured: Desert Vista, Inc.

Date	Action	Time	Rate	Total
07/15/2022	Correspond with counsel regarding availability for deposition.	0.20	\$225.00	\$45.00
08/10/2022	Confer with counsel regarding deposition scheduled for 9/6/22.	0.20	\$225.00	\$45.00
08/11/2022	Review and process plaintiff 15th □ 16th supplemental disclosure statements and document production received 8/11/22. Establish organizational protocol. Update document index. Bates #GALLERY_006488 – 6630, GALLERY-SBSA_005267-5269 and GALLERY-SBSA_005474-5542.	0.50	\$225.00	\$112.50
08/22/2022	Confer with counsel regarding availability for a pre-deposition call.	0.20	\$225.00	\$45.00
08/23/2022	Review and process plaintiff 17th supplemental disclosure statement and document production received 8/22/22. Establish organizational protocol. Update document index. Bates #GALLERY-NBC-JOBFILE_000127-128 and GALLERY-SBSA-JOBFILE_000653-688.	0.30	\$225.00	\$67.50
08/23/2022	Correspond with counsel regarding availability for a pre-deposition call.	0.20	\$225.00	\$45.00
08/24/2022	Analyze and evaluate Plaintiff's Supplemental Disclosure Statements dated 8/11/22 and 8/22/22, including plaintiff experts Nautilus Building Consultants Billing Addendum and SBSA Technical Memorandum - Amendment to BHA Rebuttal Report dated 8/9/22 with reference materials.	3.20	\$225.00	\$720.00
08/25/2022	In preparation for pre-deposition, meeting with counsel, analyze and evaluate case documents including plaintiff and developer reports and inspection data, HCCI expert reports and photographs.	4.30	\$225.00	\$967.50
08/26/2022	Analyze and evaluate Final Gallery Plat Map and Vicinity Map, developer □. Hovnanian Bid Prices, Schedule A Pricing, Gallery Standard Specifications and Work Agreement 7.21.2016.	1.30	\$225.00	\$292.50
08/29/2022	Review and process third-party defendant Desert Vista, Inc. third supplemental disclosure statement and document production received 8/25/22. Establish organizational protocol. Update document index. Bates #HCCI 000001-1323.	0.80	\$225.00	\$180.00
08/29/2022	Correspond with counsel to confirm 8/30/22 pre-deposition call.	0.20	\$225.00	\$45.00
08/29/2022	Review case file and identify relevant documents for inclusion in deposition binder including notice of deposition, expert witness designation, document index, HCCI expert report, client contract documents, and plaintiff and developer expert reports and costs to repair.	1.60	\$225.00	\$360.00



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INVOICE

Invoice # 6950-A-10
Date: 11/08/2022

Rina Rai
Rai Duer

6950-A

Gallery Community Association v. K. Hovnanian at Gallery, Inc., et al.

Insured: Desert Vista, Inc.

Date	Action	Time	Rate	Total
09/01/2022	Confer with Omega representative Steve Taylor regarding site conditions products suitable for painting plaster finish that provides water protection.	0.70	\$225.00	\$157.50
09/01/2022	Analyze and evaluate plaintiff experts SBSA, Supplemental Construction and Design Compliance Report dated 10/14/21 and Nautilus Building Consultant, Revised Preliminary Estimate of Costs dated 11/8/21 in preparation for deposition.	4.20	\$225.00	\$945.00
09/01/2022	Modify HCCI annotations on SBSA drawings dated 6/26/21.	1.20	\$225.00	\$270.00
09/01/2022	Research and confer with paint manufacturers and suppliers regarding site conditions, plaintiff allegations, elastomeric paints, installation guidelines, coverage, and costs.	1.10	\$225.00	\$247.50
09/02/2022	Analyze and evaluate deposition of Edward Fronapfel, plaintiff expert, volume I. Correlate testimony with deposition exhibits 46 – 51.	3.40	\$225.00	\$765.00
09/02/2022	Research technical articles regarding Hygric redistribution gap in the building envelope construction including United States Department of Energy Hygric Redistribution in Insulated Assemblies: Retrofitting Residential Envelopes Without Creating Moisture Issues.	2.30	\$225.00	\$517.50
09/02/2022	Review and process third-party defendant Desert Vista, Inc. fourth and fifth supplemental disclosure statements and document production, and plaintiff expert deposition transcript and exhibits received 9/02/22. Establish organizational protocol. Update document index. Prepare deponent log. Bates #DV 001157-1177.	0.80	\$225.00	\$180.00
09/02/2022	Confer with Omega representative Steve Taylor regarding site conditions and the best application for acrylic paint and primer's.	0.30	\$225.00	\$67.50
09/02/2022	Research and confer with different paint manufacturers and suppliers regarding site conditions, plaintiff allegations, Acrylic, primer paints, installation guidelines, coverage and costs.	1.20	\$225.00	\$270.00
09/03/2022	Analyze and evaluate HCCI visual inspection photographs from 11/12/21 for development of HCCI cost to repair back-up.	1.50	\$225.00	\$337.50
09/03/2022	Confer with building material suppliers regarding cost for RapidPrime and AkroCoat.	0.30	\$225.00	\$67.50
09/05/2022	Review and extract HCCI visual inspection photographs from 11/12/21 for use in development of HCCI scope of repair and cost to repair.	0.80	\$225.00	\$180.00
09/05/2022	Finalize HCCI ROM cost estimate for stucco barrier coating system.	2.30	\$225.00	\$517.50

