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***EXPERT TESTIMONY AND OTHER WORK WITHIN PRECEDING FIVE YEARS***

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- ***Liberty Surplus Insurance Company v. Seabold Construction Company***  
Circuit Court of the State of Oregon, County of Washington, Case No. C134712CV Dates: February 2, 2015 to April 23, 2015  
Formally retained on behalf of insurer Liberty Surplus by plaintiff's attorneys David Schoeggl and Matthew Kirkpatrick of Lane Powell PC, in a declaratory relief action. Provided opinions on overlapping CGL and performance bond coverages with respect to construction of an assisted living facility in Portland, OR.
  
- ***Stellar J. Construction v. Unison Solutions, Inc. et al.***  
USDC Western District of Washington, Case No. 3:12-cv-05982 RBL  
Dates: December 12, 2012 to April 9, 2015.  
Formally retained on behalf of the general contractor by plaintiff's attorneys, Joseph J. Straus and Jamila A. Johnson, Schwabe, Williams & Wyatt, in a multi-party action involving an energy project. Gave a full day of deposition testimony. Prepared a written report in contemplation of mediation, and attendance at the mediation. My report was cited in motions. The issue was whether the bond should be analyzed as a Performance Bond, despite the title "Supply Bond", plus similarities to the case of *Colorado Structures v. Insurance Company of the West* and resulting first-party bad faith exposure of the surety company. Also prepared a report regarding surety company recovery from indemnitors' CGL policies to make a global settlement a possibility for the benefit of the GC.
  
- ***Excel Masonry, Inc. v. K & B Quality Masonry, Inc., and Insurance Company of the West***  
Superior Court of Alabama, Birmingham, AL. Dates: 2014  
Fact witness for Insurance Company of the West. Informally "adopted" by the court as a quasi-expert witness. Gave a hybrid of both fact and expert trial testimony, but was not "qualified" as an expert by the judge. The issue was the distinction between common law and statutory bonds and the resulting legal effect upon the Alabama Prompt Payment Statute. Educated the judge from the witness stand in response to his direct questions. Judge Robert Vance. My trial testimony benefited both the GC and its surety, ICW. The surety company's attorney was Thomas L. Selden of Starnes, Davis, Florie LLP, Birmingham.

**Current Expert Assignments/Two Pending Cases - 2019 (Against Insurers)**

Retained by homeowners / insureds against their mortgage lenders and lender-placed insurers. Washington state law. Provided a written report and gave deposition May 2018 in one of these.

**Support for 1963 Consent Decree (Against Insurers)**

Sent letter to U.S. Senator on behalf of a consortium of auto collision repair businesses in support of maintenance of the 1963 Decree against insurers. September 2019.