

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT,  
IN AND FOR FLAGLER COUNTY, FLORIDA

CITY OF PALM COAST, a Florida  
governmental entity,

Plaintiff,

CASE NO: 2022-CA-000773

vs.

BBI CONSTRUCTION MANAGEMENT, INC.,  
a Florida profit corporation; NO FAULT LLC, a  
foreign limited liability company; S&ME, INC.,  
a foreign profit corporation; WESTFIELD  
INSURANCE COMPANY, a foreign profit  
company, VORTEX AQUATIC  
CORPORATION, a foreign profit corporation;  
and AQUATIC CONSULTING ENGINEERS,  
INC., a Florida profit corporation,

Defendants.

\_\_\_\_\_ /

BBI CONSTRUCTION MANAGEMENT, INC.,  
a Florida corporation

Third-Party Plaintiff,

vs.

4C's TRUCKING & EXCAVATION, INC., a  
Florida profit corporation; COST OF  
WISCONSIN, INC., a Florida profit  
corporation; KDK CONCRETE OF VOLUSIA,  
INC., a Florida profit corporation; REP  
SERVICES, INC., a Florida profit corporation;  
TURNSOLE BUILDERS, LLC, a Florida  
limited liability company; WELLER POOLS,  
LLC, a Florida limited liability company,

Third-Party Defendants

\_\_\_\_\_ /

NO FAULT LLC

Third-Party Plaintiff,

vs.

A&W SAFETY SURFACING, LLC d/b/a  
PLAYSAFE SURFACING, LLC; and  
AMERICAN RECYCLING CENTER INC,

Third-Party Defendants.

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**PLAINTIFF, CITY OF PALM COAST'S, EXPERT WITNESS DISCLOSURE**

Plaintiff, City of Palm Coast (the "City"), by and through undersigned counsel, hereby discloses its expert witnesses and states as follows:

1. **Kenneth R. Martin**  
Martin Aquatic Design & Engineering, LLC  
189 South Orange Avenue, Suite 1220  
Orlando, FL 32801

Area(s) of expertise – Mr. Martin's areas of expertise and qualifications can be found in his curriculum vitae, which is incorporated and attached hereto as **Exhibit "A"**.

Subject matter of expected testimony – Mr. Martin is expected to provide expert testimony regarding his expert report, project occurrences and actions that contributed to the splash pad's failures, and the scope, design, and method of repair for the splash pad. Further, Mr. Martin is expected to provide expert testimony regarding the roles and responsibilities of the design team on the project, relevant building/industry codes and standards, the applicable standard of care for design professionals, and the failure of No Fault's product for the intended use and purpose of the splash pad. Mr. Martin will also respond, opine, and/or rebut the expert opinions/conclusions of the other parties.

Substance of facts and opinions – Mr. Martin's expert report is being served contemporaneously to counsel of record under separate cover.

Summary of the grounds on which the opinion will be based – Mr. Martin’s opinions will be based upon his extensive qualifications and experience, which are fully described in his curriculum vitae. Mr. Martin’s opinions are and will be based on his site inspections and observations/testing, interview of City personnel, review of available testimony, review of project records, and review of project investigative and repair documents.

Deposition availability – Dates for Mr. Martin’s deposition can be mutually coordinated with counsel upon request.

2. **Luke Miorelli, P.E., CGC**  
MEC Forensics, LLC  
4715 North Harbor City Boulevard  
Melbourne, FL 32935

Area(s) of expertise – Mr. Miorelli’s areas of expertise and qualifications can be found in his curriculum vitae, which is incorporated and attached hereto as **Exhibit “B”**.

Subject matter of expected testimony – Mr. Miorelli is expected to provide expert testimony regarding his expert report, as well as the amount and calculation of the City’s damages, including but not limited to repair and remediation costs for the splash pad. Further, Mr. Miorelli is expected to provide expert testimony regarding the roles and responsibilities of the construction team on the project (including but not limited to BBI and its subcontractors), relevant building/industry codes and standards, and the applicable standard of care for general contractors. Mr. Miorelli will also respond, opine, and/or rebut the expert opinions/conclusions of the other parties.

Substance of facts and opinions – Mr. Miorelli’s expert report is being served contemporaneously to counsel of record under separate cover.

Summary of the grounds on which the opinion will be based – Mr. Miorelli's opinions will be based upon his extensive qualifications and experience, which are fully described in his curriculum vitae. Mr. Miorelli's opinions are and will be based on his site inspections and observations, interview of City personnel, review of available testimony, review of project records, and review of project investigative and repair documents.

Deposition availability – Dates for Mr. Miorelli's deposition can be mutually coordinated with counsel upon request.

**DATED this 8th day of November, 2024.**

/s/ Trevor B. Arnold  
**TREVOR B. ARNOLD**  
Florida Bar No.: 0545902  
**NIKKI K. BHAVSAR**  
Florida Bar No.: 1018481  
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*Attorneys for Plaintiff, City of Palm Coast*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, on this 8th day of November, 2024, that a true copy of the foregoing has been filed with Florida's eFiling Portal, which will deliver a service copy via electronic mail to counsel of record.

<b>G. JOHN VEITH, ESQ.</b> <b>PATRICK D. HINCHEY, ESQ.</b> Luks, Santaniello, Petrillo, Cohen & Peterfreund 301 West Bay Street, Suite 1010 Jacksonville, FL 32202	<b>THOMAS OGLESBY, ESQ.</b> <b>JOSHUA-CALEB BARTON, ESQ.</b> Resnick & Louis, P.C. 444 Brickell Avenue, Suite 300 Miami, FL 33131 Tel: (786) 975-1999
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<p><b>EDDIE BAIRD, ESQ.</b>  <b>MARK SNELSON, ESQ.</b>  Baird Law, PLLC  1104 Solana Avenue  Winter Park, FL 32789  T: (407) 906-7615  <a href="mailto:eddie@baird.law">eddie@baird.law</a>  <a href="mailto:mark@baird.law">mark@baird.law</a>  <a href="mailto:amanda@baird.law">amanda@baird.law</a></p> <p><i>Counsel for Defendant, S&amp;ME, Inc.</i></p>	<p><b>JASON R. MOYER, ESQ.</b>  <b>ALEXANDER R. ALLRED, ESQ.</b>  Moyer Law Group  770 Second Avenue South  St. Petersburg, FL 33701  T: (727) 310-2002  <a href="mailto:service-jmoyer@moyerlawgroup.com">service-jmoyer@moyerlawgroup.com</a>  <a href="mailto:jmoyer@moyerlawgroup.com">jmoyer@moyerlawgroup.com</a></p> <p><i>Counsel for Defendant, No Fault LLC</i></p>
<p><b>DAVID L. WORTHY, ESQ.</b>  <b>DON NIESEN, ESQ.</b>  <b>CHRISTOPHER W. LEWIS, ESQ.</b>  Niesen, Price, Worthy, Campo, P.A.  5216 SW 91<sup>st</sup> Drive  Gainesville, FL 32608  T: (352) 373-9031  <a href="mailto:dave@npw-law.com">dave@npw-law.com</a>  <a href="mailto:anna@npw-law.com">anna@npw-law.com</a>  <a href="mailto:chris@npw-law.com">chris@npw-law.com</a></p> <p><i>Counsel for Defendant, Westfield Insurance Company</i></p>	<p><b>BETH ANN SCHULMAN, ESQ.</b>  <b>NADINE J. FOEHL, ESQ.</b>  Boyd &amp; Jennerette, P.A.  2290 Lucien Way, Suite 260  Maitland, FL 32751  T: (407) 309-4760  <a href="mailto:bschulman@boydjen.com">bschulman@boydjen.com</a>  <a href="mailto:nfoehl@boydjen.com">nfoehl@boydjen.com</a>  <a href="mailto:smeadows@boydjen.com">smeadows@boydjen.com</a>  <a href="mailto:jalvarado@boydjen.com">jalvarado@boydjen.com</a></p> <p><i>Counsel for Third-Party Defendant, Weller Pools, LLC</i></p>
<p><b>RINALDO J. CARTAYA, III, ESQ.</b>  <b>ROBERT N. JOHNSON, ESQ.</b>  <b>ANTHONY M. HORNİK, ESQ.</b>  Quintairos, Prieto, Wood &amp; Boyer, P.A.  255 South Orange Avenue, Suite 900  Orlando, FL 32801  T: (407) 872-6011  <a href="mailto:Rinaldo.cartaya@qpwbllaw.com">Rinaldo.cartaya@qpwbllaw.com</a>  <a href="mailto:Anthony.hornik@qpwbllaw.com">Anthony.hornik@qpwbllaw.com</a>  <a href="mailto:Erik.schiff@qpwbllaw.com">Erik.schiff@qpwbllaw.com</a>  <a href="mailto:Robert.ruiz@qpwbllaw.com">Robert.ruiz@qpwbllaw.com</a>  <a href="mailto:William.sewell@qpwbllaw.com">William.sewell@qpwbllaw.com</a>  <a href="mailto:Margaret.efta@qpwbllaw.com">Margaret.efta@qpwbllaw.com</a></p>	<p><b>DAVID M. ADELSTEIN, ESQ.</b>  Kirwin Norris, P.A.  15 W. Church Street, Suite 301  Orlando, FL 32801  T: (407) 740-6600  <a href="mailto:dma@kirwinnorris.com">dma@kirwinnorris.com</a>  <a href="mailto:bhh@kirwinnorris.com">bhh@kirwinnorris.com</a>  <a href="mailto:azt@kirwinnorris.com">azt@kirwinnorris.com</a>  <a href="mailto:jan@kirwinnorris.com">jan@kirwinnorris.com</a></p> <p><i>Counsel for Third-Party Defendant, American Recycling Center, Inc.</i></p>

<p><a href="mailto:Guyliana.plantain@qpwblaw.com">Guyliana.plantain@qpwblaw.com</a>  <a href="mailto:cdorlandofiling@qpwblaw.com">cdorlandofiling@qpwblaw.com</a></p> <p><i>Counsel for Third-Party Defendant, REP Services, Inc.</i></p>	
<p><b>GERALYN M. PASSARO, ESQ.</b>  Litchfield Cavo LLP  600 Corporate Drive, Suite 600  Fort Lauderdale, FL 33334  T: (954) 689-3011  <a href="mailto:passaro@litchfieldcavo.com">passaro@litchfieldcavo.com</a>  <a href="mailto:donaldson@litchfieldcavo.com">donaldson@litchfieldcavo.com</a>  <a href="mailto:sterl@litchfieldcavo.com">sterl@litchfieldcavo.com</a></p> <p><i>Counsel for Third-Party Defendant A&amp;W Safety Surfacing, LLC d/b/a Playsafe Surfacing, LLC</i></p>	<p><b>JOHN A. GUYTON, III, ESQ.</b>  Rywant, Alvarez, Jones, Russo &amp; Guyton, P.A.  302 Knights Run Avenue, Suite 1000  Tampa, FL 33602  T: (813) 229-7007  <a href="mailto:Jguyton@rywantalvarez.com">Jguyton@rywantalvarez.com</a>  <a href="mailto:service@rywantalvarez.com">service@rywantalvarez.com</a>  <a href="mailto:anewell@rywantalvarez.com">anewell@rywantalvarez.com</a></p> <p><i>Counsel for Third-Party Defendant, 4C's Trucking &amp; Excavation, Inc.</i></p>
<p><b>CURTIS L. BROWN, ESQ.</b>  <b>DANIEL J. LOPEZ, ESQ.</b>  Wright, Fulford, Moorhead &amp; Brown, P.A.  505 Maitland Avenue, Suite 1000  Altamonte Springs, FL 32701  T: (407) 425-0234  <a href="mailto:cbrown@wfmblaw.com">cbrown@wfmblaw.com</a>  <a href="mailto:khartin@wfmblaw.com">khartin@wfmblaw.com</a>  <a href="mailto:dlopez@wfmblaw.com">dlopez@wfmblaw.com</a></p> <p><i>Counsel for Defendant, Aquatic Consulting Engineers, Inc.</i></p>	<p><b>STEVEN D. PAVEGLIO, ESQ.</b>  Hall Booth Smith, P.C.  200 Forsyth Street, Suite 400  Jacksonville, FL 32202  T: (904) 236-4929  <a href="mailto:Pavegliopleadings@hallboothsmith.com">Pavegliopleadings@hallboothsmith.com</a>  <a href="mailto:spaveglgio@hallboothsmith.com">spaveglgio@hallboothsmith.com</a>  <a href="mailto:sbanschbach@hallboothsmith.com">sbanschbach@hallboothsmith.com</a></p> <p><i>Counsel for Third-Party Defendant, KDK Concrete of Volusia, Inc.</i></p>
<p><b>ELIZABETH B. FERGUSON, ESQ.</b>  <b>TAYLOR A. NAUGHTON, ESQ.</b>  Marshall Dennehey, P.C.  200 W. Forsyth Street, Suite 1400  Jacksonville, FL 32202  T: (904) 358-4200  <a href="mailto:ebferguson@mdwccg.com">ebferguson@mdwccg.com</a>  <a href="mailto:tanaughton@mdwccg.com">tanaughton@mdwccg.com</a>  <a href="mailto:psaranaga@mdwccg.com">psaranaga@mdwccg.com</a>  <a href="mailto:pjlagrone@mdwccg.com">pjlagrone@mdwccg.com</a></p> <p><i>Counsel for Defendant, Vortex Aquatic Corporation</i></p>	

/s/ Trevor B. Arnold  
TREVOR B. ARNOLD, ESQ.

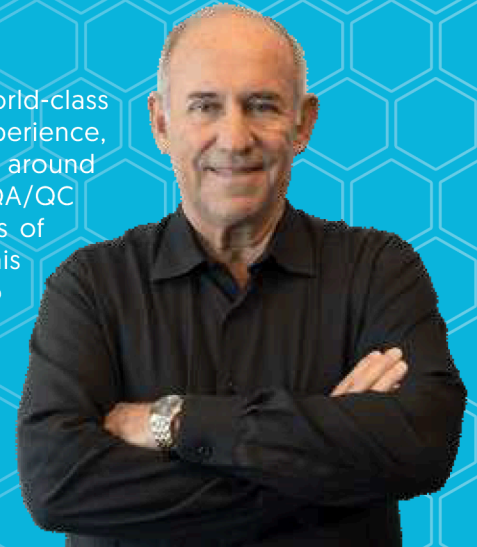
# **EXHIBIT “A”**

# Ken Martin

## Founding Principal

Ken Martin founded Martin Aquatic in 1987 and is recognized as a world-class aquatic designer and expert. With 40 years of international project experience, he has designed an aquatic feature in every type of climate or condition around the globe. Ken's unique knowledge base supports the work of the QA/QC department, where he reviews engineering documents along the phases of design to ensure our projects always remain executable. Because of his skillset, he is also regularly called upon for expert witness testimony and to conduct audits and reviews of existing facilities. As an MBA recipient and a graduate from the Harvard School of Design, Ken possesses a strong business foundation that has allowed Martin Aquatic to grow into a best-in-class aquatics firm.

E: Ken@MartinAquatic.com T: 407.598.0551 M: 407.595.3951



## Recent and Notable Project Experience

Ken Martin has been involved in the following projects:

**Daytona Beach Riverfront Esplanade**  
Daytona Beach, Florida | 2019-ongoing

**The Ritz-Carlton Kapalua**  
Maui, Hawaii | 2019-2021

**UNF Competition Pool**  
Orlando, Florida | 2019-2021

**Bell Tower Green**  
Salisbury, North Carolina | 2018-2021

**The Ritz-Carlton St. Thomas**  
St. Thomas, US Virgin Islands | 2018-2020

**Royal Caribbean's Oasis of the Seas**  
Miami, Florida | 2018-2019

**Royal Caribbean's Perfect Day at CocoCay**  
CocoCay, Bahamas | 2017-2019

**Tokyo Disneyland's Celebrate! Spectacular**  
Tokyo, Japan | 2017-2018

**Long Beach Performing Arts Center**  
Long Beach, California | 2017-2018

**The St. James Wellness Center**  
Springfield, Virginia | 2016-2018

**Morgan's Wonderland**  
San Antonio, Texas | 2015-2017

**Baha Mar Resort**  
Nassau, Bahamas | 2013-2017

**Disney Springs**  
Lake Buena Vista, Florida | 2013-2016

**Presidential Palace**  
Abu Dhabi, UAE | 2011-2015

**Woodforest Amenity Center**  
Montgomery, Texas | 2012-2014

**Smale Riverfront Park**  
Cincinnati, Ohio | 2010-2012

**Yas Welcome Pavilion at Ferrari Theme Park**  
Yas Island, Abu Dhabi, UAE | 2009-2010

**City of Dreams**  
Macao, China | 2007-2009

**Renaissance Plaza Fountain**  
White Plains, New York | 2002-2004

**Universal Studios Globe Fountain**  
Orlando, Florida | 1997-1999

**Delano Hotel**  
Miami, Florida | 1994-1995

## Education

Nova University  
Masters in Business  
Administration – 1994

University of Central Florida  
Engineering Course Work – 1987  
Business Administration – 1972

Harvard University  
Graduate School of Design – 1984

## Registrations and Affiliations

Florida Swimming Pool  
Association Secretary  
2014-Present

National Sanitation Foundation  
Board Member – 2005-Present

Public Swimming & Bathing  
Facilities Advisory Review Board

Southern Building Code  
Conference Professional  
Member – 1991

Florida Swimming Pool  
Association President – 1982



## Expert Profile – Pools/Water Features/Basins/Aquatics

Kenneth R. Martin – Founding Principal – Martin Aquatic

13 August 2024

Kenneth R. Martin – Expert Profile

- Refer to the resume attachment and the Qual Pack for additional information.
- Some references are ADE (Aquatic Design & Engineering, Inc.) DBA Martin Aquatic Design & Engineering (or Martin Aquatic).

### 1. Previous Typical Court/Expert Witness Cases

Expert Witness Case	Type of Issue	Attorney & Contact Info	Represented the:
<b>San Marco Place Condominium Vs. Haskell Jacksonville, FL</b>	Above-grade, On-Structure Stainless Steel Pool Basin Related Issues	Gunster Law Firm Attn: Kelli Humphries, Esq. 904-350-7434 <a href="mailto:KHumphries@gunster.com">KHumphries@gunster.com</a>	Defendant
<b>Grand Oaks Manor Jennings Construction Vs. Wiseman Ventures Marion County, FL</b>	Commercial pool structural failure	Shutts & Bowen Attn: Eric Reed, Esq. (407) 835-6790 <a href="mailto:EReed@shutts.com">EReed@shutts.com</a>	Plaintiff
<b>Graf Residence Pool/Spa M/M Graf Vs. John Cannon Homes Long Boat Key, FL</b>	Residential Pool/Spa Structural Deterioration and Cracking Issues	Jason Lambert, Esq. Nelson Mullins PA (813) 225-3057 Jason Lambert <a href="mailto:Jason.Lambert@nelsonmullins.com">Jason.Lambert@nelsonmullins.com</a>	Defendant
<b>101 S. Eola Condo Assn. Vs. Certified Pools Orlando, FL</b>	Above-grade, On-Structure Stainless Steel Pool Basin Related Issues	Michael Milne, Esq. Milne Law Group, PA (321) 558-7700 <a href="mailto:mmilne@milnelawgroup.com">mmilne@milnelawgroup.com</a>	Defendant

### 2. Recent Articles/Publications written by ADE / Martin Aquatic

October 2012: *American Builders Quarterly* magazine

- "Making a Splash" – featuring a profile on ADE and its company history
- *Florida-based Aquatic Design & Engineering cut its teeth in the theme park industry before expanding to water features around the world*

April 2013: *i4 Business* magazine

- "Aquatic Design & Engineering" – featuring a profile on ADE and its company history



## Expert Profile – Pools/Water Features/Basins/Aquatics

Kenneth R. Martin – Founding Principal – Martin Aquatic

- *Creating with the magic and motion of water*

October/November 2014: *Retail Facility Business* magazine

- "Something in the Water"
- *Enhancing retail environments with aquatics*

January 2015: Landscape Architecture Foundation blog

- "Pushing to Improve Sustainability in Aquatics"
- *How water features can enhance a project's green footprint*

March 2015: *Orlando Sentinel*

- "Orlando firm designs slides for Royal Caribbean's new ship" – featuring ADE project and interview with Josh Martin.
- *Orlando-based Aquatic Design & Engineering is the creative designer for the water slides on what shall become the world's largest cruise ship.*

May 2015: *Parks and Rec Business* magazine

- "When A Community Treasure Crumbles"
- *Restoring and revitalizing an aquatic facility for the long haul*

January 2016: *Middle East Consultant* magazine

- "The Specialists" – featuring a profile on ADE and its international projects
- *Uncovering the niche consultants that have made a mark on GCC buildings*

July 2016: *Parks and Rec Business* magazine

- "First-Class and Financially Feasible"
- *The engineering considerations of a splash pad*

August 2016: *WaterShapes*

- "An Exotic Oasis"
- *Water features inside the splendor of Abu Dhabi's Yas Mall*

July/August 2016: *Hotel Business Design* magazine

- "Cool in the Pool" – featuring ADE project and interview with Josh Martin
- *Whether whimsical or classic, these new designs are sure to make waves*

October 2016: *Aquatics International* magazine

- "Renovating History" – featuring ADE projects and interview
- *Experts explain how to bring a historic site up-to-date*

September 2017: *Attractions Management* magazine

## Expert Profile – Pools/Water Features/Basins/Aquatics

Kenneth R. Martin – Founding Principal – Martin Aquatic

- "Water Wonderland" – featuring ADE project and interview
- *Speaking with the team behind Morgan's Inspiration Island, a new waterpark designed for children with disabilities and special needs*

September 2017: *Pool and Spa News* magazine

- "Makings of a River" – featuring ADE project and interview
- *Aquatics veterans explain the hydraulics behind building these vessels*

September 2018: Life Floor blog

- "Leaders in Aquatic Design: Aquatic Design & Engineering" – featuring a profile on ADE
- *How ADE approaches creating, retrofitting, and expanding aquatic areas for their clients*

July 2019: *Parks and Rec Business* magazine

- "Cutting Corners: The real cost of unsafe aquatic design."
- *Important safety elements that are necessary to consider when designing a public aquatic feature.*

Autumn 2020: *Parks World* magazine

- "A recurring theme..." – featuring a Martin Aquatic project and interview
- *Talking with experts to explore current and future trends in the design of waterparks and resorts.*

April 2021: *Parks and Rec Business* magazine

- "The Soothing Sounds of Water"
- *How to integrate placemaking water features into a park.*

July/August 2021: *World Waterpark Magazine*

- "When is the Right Time to Plan for New Attractions?"
- *Designing and launching a new attraction requires well-thought-out planning steps that should take place months before the project begins.*

## Hourly Rates

Title	USD Hourly Rate
Founding Principal	\$265.00
Founding Principal, Expert Witness Services	\$550.00
Creative Director	\$230.00
Studio Director	\$220.00
Senior Engineer	\$210.00
Senior Engineer, Expert Witness Services	\$450.00
Senior Structural Engineer	\$210.00
Production Director	\$200.00
Project Director	\$190.00
Project Engineer	\$190.00
Design Project/Studio Manager	\$175.00
Design Technologies Director	\$170.00
Senior Project Manager	\$170.00
Senior Engineering Coordinator, EIT (FE)	\$170.00
Engineering Coordinator, EIT (FE)	\$160.00
Project Manager	\$160.00
Senior Design Coordinator	\$150.00
Engineering Coordinator	\$150.00
3D Designer	\$140.00
Production Coordinator	\$130.00
Design Coordinator	\$130.00
Research Assistant / Administrator	\$ 90.00





# **EXHIBIT “B”**

# MEC Forensics, LLC

**LUKE MIORELLI, P.E.**

## EDUCATION

BS, Civil Engineering, University of Florida, 1978.

## EXPERIENCE

### **January 2022 to Present: MEC Forensics, LLC Owner**

Forensic Engineering – Building Envelope issues, construction defects, design defects, construction claims, insurance claims, cost to cure, Standard of Care, expert witness testimony.

### **1995 to December 2021: President, M.E. Construction, Inc. (Retired)**

Commercial Construction - Professional Offices, Medical Offices and labs, Industrial buildings, Convenience Stores, Telecommunications facilities, Television Towers and Support facilities, Churches, Retail Centers, Event Halls.

Civil Design - site plans, roads, drainage, surface water pollution control, sanitary sewer systems, water distribution systems, utility relocation, zoning changes, zoning variances, FDEP, FDOT, County and City permitting.

Structural Design - structural steel, reinforced concrete, pre-stressed concrete, timber, wood, reinforced masonry, structural renovations, structural modifications, piling, signs, and satellite dishes.

Forensic Engineering - roof inspections, water infiltration, water damages, construction defects, design defects, construction claims, insurance claims, cost to cure, expert witness testimony.

### **1980 to 1995: Vice President/CEO, Miorelli Engineering, Inc.**

Commercial Construction - Office and industrial buildings to 120,000 SF, including reinforced concrete, tilt-up concrete, reinforced masonry, structural steel, pre-engineered steel, post tensioned structures and miscellaneous hybrid building types.

Civil Design - roads, drainage, surface water pollution control, sanitary sewer systems, water distribution systems, utility relocation, zoning changes, zoning variances, site planning and layout.

Structural Design - Structural Steel, reinforced concrete, prestressed concrete, timber, wood, reinforced masonry, structural renovations, structural modifications, piling, signs. Forensic Engineering - roof inspections, water infiltration, water damages, construction defects, design defects, storm damage, insect damage, construction claims, insurance claims, expert witness testimony.

### **1978 to 1980: Cost analyst, Fluor Corporation, Shedgum, Saudi Arabia.**

Duties included cost tracking and forecasting, estimating changes and subcontractor change orders on \$1.25 billion NGL plant construction.

### **Professional Registrations/ Certifications:**

Florida Certified General Contractor, 1981, License# CCG019528.  
Florida Professional Engineer, August 2, 1985 PE # 0036127  
Certified Masonry Inspector  
Board Certified Senior Member National Academy of Forensic Engineers  
Board Certified Diplomate International Board of Forensic Engineers and Scientists

### **Community Support:**

Rotary Club  
Past Vice Chairman Brevard County Construction Licensing Board Member  
Past Vice Chair Brevard County Building Code Board of Adjustments

# MEC Forensics, LLC

Billing Rates January 31, 2022

Thank you for engaging MEC Forensics, LLC for your forensic engineering needs. Below you will find our rate scale.

Luke Miorelli, P.E. Principal	\$325.00 per hour
Professional Engineer, VP/ CGC	\$215.00 per hour
Engineers, Project Managers and Sr. Estimators	\$125.00 per hour
E.I. and Estimators	\$120.00 per hour
Drafting	\$ 87.00 per hour
Clerical	\$ 75.00 per hour
Assistant	\$ 75.00 per hour
CD	\$ 20.00 per disc / \$30.00 flashdrive
Mileage	0.585¢ per mile
Thermal Imaging Equipment use, if needed	\$165.00 per day
Reproduction and other expenses	@ Cost

**List of cases in which Luke Miorelli, P.E. has testified as an expert in trial or deposition since 2002. (3/7/22)**

Year	Case	Testimony	Issue	Jurisdiction	Attorney	Defendant / Plaintiff
2002	Honeymoon Hill Construction vs. Toledo Engineering	Deposition and Trial Testimony for the contractor	Free air space for Condensing units, Cracking in exterior building envelope, differential movement between buildings causing water intrusion. Case settled when Mr. Miorelli pointed out the contract between the parties did not allow for attorneys' fees	18 <sup>th</sup> Circuit Court of Florida	Frese, Hansen, Et Al	Plaintiff
2002	M.H. Williams, Inc. vs. Magnolia Plantation Golf Club	Mediation Testimony for the contractor	Construction defects mostly Punchlist items. Case settled with contractor accepting partial immediate payment. Owner file for Bankruptcy shortly afterwards.	Mediation	David Larson	Plaintiff
2004	Barbara Sadala vs. Maronda Homes	Deposition Testimony for the owner	Latent Defects. Moisture, Mold. The exterior walls of the home were built off-site and failed to flash the windows. The intersection of the eaves of portions of the roof were built as to direct water into the wood framed exterior walls. The Owner prevailed.	18 <sup>th</sup> Circuit Court of Florida	Herbert Allen, Jr	Plaintiff

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2004	Dave Armstrong Builders vs. Riverside Bank	Deposition Testimony for the Contractor	Construction Defects, Contract disputes over Punchlist items and some materials not being supplied as specified. Case settled for undisclosed amount.		David Larkin	Plaintiff
2005 / 2007	Craftmaster Auto Body vs. Meade Construction	Deposition and Trial Testimony for the Owner	Design and Construction Defects. Exterior load bearing wall on a monolithic foundation settled into the retention swale built too close to the wall.	18 <sup>th</sup> Circuit Court of Florida	Allan Whitehead	Plaintiff
2005	Adams Construction vs. Versailles Condominium	Deposition Testimony for the Contractor	Contract interpretation and specification interpretation. Contractor installed steel members exposed to the weather at an Oceanside condominium. Contract called for epoxy coatings and welding that were incompattable.	18 <sup>th</sup> Circuit Court of Florida		Defendant
2006	Siberski/Valentine vs. Mercedes Homes	Deposition and Arbitration Testimony for the Owner	Construction defects, code compliance. Stucco, paint, flashing, and caulking were improperly installed or missing causing systemic water intrusion.	Arbitration	Nance, Cacciatore, PA	Plaintiff

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2006	Gautum vs. Mercedes Homes	Deposition and Arbitration Testimony for the Owner	Construction defects, code compliance. Stucco, paint, flashing, and caulking were improperly installed or missing causing systemic water intrusion.	Arbitration	Nance, Cacciatore, PA	Plaintiff
2006	Solari vs. Mercedes Homes	Deposition and Arbitration Testimony for the Owner	Construction defects, code compliance. Stucco, paint, flashing, and caulking were improperly installed or missing causing systemic water intrusion.	Arbitration	Nance, Cacciatore, PA	Plaintiff
2007	Firlejczyk vs. Mercedes Homes	Deposition and Arbitration Testimony for the Owner	Construction defects, code compliance. Stucco, paint, flashing, and caulking were improperly installed or missing causing systemic water intrusion.	Arbitration	Nance, Cacciatore, PA	Plaintiff
2007	Heine vs. Parent Construction	Deposition and Trial Testimony for the Owner	Construction defects, code compliance. Large expensive custom home in John's Island, Indian River County, FI was built below the flood plain. Resulted in swimming pool being very shallow and drainage issues with the home.	19 <sup>th</sup> Circuit Court of Florida	Allan Whitehead	Plaintiff
2007	Villasol Realty Co. vs. J & S Curb/Concrete, Inc.	Deposition Testimony for the Contractor	Contract interpretation and specification interpretation.		Michael Riemenschneider	Defendant



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			Contract documents called for the use of a 2" pump permitted through SJRWMD to dewater the site for excavation of the stormwater system. The pump proved to be too small and delayed the work. Because of the delay, Tropical weather caused the excavation to re-flood.			
2007	Hobson-Magnuson vs. TNT Electric and Construction	Trial Testimony for the home owner	Construction Defects and Permitting Punch list items and quality of work.	18 <sup>th</sup> Circuit Court of Florida	Ed Kinberg	Plaintiff
2007	Dave Armstrong Custom Homes vs. Charles Gibson	Arbitration Testimony for the Contractor	Construction Defects Punchlist dispute	Arbitration	David Larkin	Plaintiff
2008	Michael Weideman vs. Villanueva	Trial Testimony for the Roofer	Construction Defects	18 <sup>th</sup> Circuit Court of Florida case #05-2006-CA-037750	Charles Schillinger	Defendant
2008	Rahal Development vs. Dr. Niazi	Arbitration Testimony for the Contractor	Construction Defects / Scheduling Cardinal change in the plans. The original plans showed a simple home. What resulted was a McMansion with all of the trimmings. Highlights of the arbitration were the Owner representing himself with his attorney describing	Arbitration	Michael Minot	Plaintiff

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			himself as a Potted Plant. The Contractor recounted how he and the Owner, after signing the Contract, spent the remainder of the evening at a local Topless Bar.			
2008	Ingram vs. Builder	Deposition and trial testimony for the Homeowner	Construction Defects, code compliance	18 <sup>th</sup> Circuit Court of Florida case #05-2005-CA-067465	Allan Whitehead	Defendant
2008	Jupiter Ocean Grand vs. Rob's Interiors	Deposition testimony for Rob's Interiors	Construction Defects, Stucco and water intrusion	19 <sup>th</sup> Circuit Court of Florida	Andrew Showen	Defendant
2009	Andrews vs. Jackson Homes	Deposition & Trial testimony for Andrews	Construction Defects, Code Compliance	18 <sup>th</sup> Circuit Court of Florida	Allan Whitehead	Plaintiff
2009	Salgar Construction vs. Abbas Pazouhandeh	Trial Testimony for Salgar Construction	Construction Defects, Cost to complete	18 <sup>th</sup> Circuit Court of Florida	Charles Schillinger	Plaintiff
2009	Paulon Construction Management vs. River Bluff Condominium Association	Arbitration Testimony for the Construction manager	Construction Defects	Arbitration	Charles Schillinger	Defendant
2009	Somerset Development vs. Meade/Treadway	Trial Testimony for Somerset	Construction Delays, Hurricane impact on schedules	18 <sup>th</sup> Circuit Court of Florida	Gray Robinson PA Jack Kirschenbaum	Defendant
2009	Core General Contractors, Inc vs. Rene & Lizbeth Arencibia	Trial Testimony for Rene & Lizbeth Arencibia	Construction Defects, Cost to repair	19 <sup>th</sup> Judicial Circuit of Indian River County Case# 2007-1378-CA03	Andrew Douglas	Plaintiff
2009	Herman & Joyce Cole vs. Somerset Riverfront Development, Inc	Trial Testimony for the Developer	Construction Defects, Schedule	18 <sup>th</sup> Circuit Court of Florida	Gray Robinson PA Jack Kirschenbaum	Defendant
2010	Apotheker vs. Superior Window	Arbitration Testimony	Window leaks	Brevard County	Owner	Plaintiff
2010	Charles & Marsha Foglio vs. Ocean Beach	Deposition Testimony for Owner	Construction Defects	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Diane Zelmer	Defendant



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	Development & Kabbord Properties, Inc					
2010	John Knox Village v. Blue Water Builders	Deposition Testimony for the Contractor and Subcontractors	Construction Defects/Cost to Cure	17 <sup>th</sup> Judicial Circuit Court for Broward County	Gaunt, Pratt, Radford, Methe & Rockenbach, P.A.	Plaintiff
2010	J. Remyn v. Publix, et al.	Deposition Testimony for Plaintiff	Construction Defect/Personal Injury	18 <sup>th</sup> Judicial Circuit Court for Brevard County	High, Stack, & Gordon Michael Kirby	Plaintiff
2011	LeJardin at Baytown Warf Townhomes	Deposition Testimony for Plaintiff	Construction Defects	1 <sup>st</sup> Judicial Circuit for Walton County	Gray Robinson PA / Trevor Arnold	Defendant
2011	LaColonnade Condominium	Deposition Testimony for Plaintiff	Construction Defects	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Frese, Hansen PA Allan Whitehead	Defendant
2011	Siano v Holmes Regional Medical Center	Deposition Testimony for Plaintiff	Construction Defect/Personal Injury	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Nance, Cacciatore PA Sammy Cacciatore	Plaintiff
2011	Marine Bank v Florida Business Bank, Island Oaks Condominium	Trial Testimony for Florida Business Bank	Construction Cost / Estimate to Complete	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Frese Hansen PA Allen Whitehead	Defendant
2011	Joyce Bowles v Carmax Auto Superstores, Inc	Deposition Testimony for Carmax	Construction Defect/Personal Injury	18 <sup>th</sup> Judicial Circuit Court for Seminole County	Luks, Santaniello, Petrillo & Jones Paul Jones	Defendant
2012	The Bartrum v C.B. Contractors v Rosewell Masonry	Deposition Testimony for Bartrum	Construction Defect	District Court for the Northern District of Florida, Gainesville Division	Wicker Smith PA Robert Saunders	Defendant
2012	Siena Place Condominium v Ray Engineering, Inc.	Deposition Testimony for Siena Place Condominium	Construction Defect	9 <sup>th</sup> Judicial Circuit Court of Florida	Gray Robinson PA Trevor Arnold	Defendant
2012	Siena Condominium at Celebration	Deposition Testimony for Dunn Corporation	Construction Defect	9 <sup>th</sup> Judicial Circuit Court of Florida	Law Offices of Jack D. Evans Teresa Eyerman	Defendant
2012	Baldwin Park v Axiom	Deposition for Axiom	Construction Defect	9 <sup>th</sup> Judicial Circuit Court of Florida	Klein Glasser Park Lowe & Pelstring Houston Park	Defendant

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2012	FDIC v MHF Construction	Deposition for MHF Construction	Construction Defect	11 <sup>TH</sup> Judicial Circuit Court of Florida	Johnson Law Group Michael Wargo	Defendant
2012	Manning Building Supplies, Inc. v Jane Madry, John Pavlakos Gen. Contr. Inc. & John Pavlakos	Trial Testimony for Manning	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Worman & Sheffler, P.A. Robert Worman	Plaintiff
2013	Thomas & Constantina Andrew, Laufen, Inc. & James Jackson v Mid-Continent Casualty Company	Deposition Testimony for Andrew	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Law Offices of Freese Hansen Allen Whitehead	Defendant
2013	RCL Construction, Inc. v Wackenhut	Deposition Testimony for RCL Construction, Inc.	Construction Defect	19 <sup>th</sup> Judicial Circuit of Indian River County	Randy Brennan, PA.	Defendant
2013	Concrete Restoration, Inc. v Lantana Ocean Front Condo Assoc.	Deposition Testimony for Lantana Ocean Front Condo Assoc.	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Luks, Santaniello, Petrillo & Jones Paul Jones	Defendant
2013	Eunice Elizabeth Wenninger v Phillip C. Houbler Trust / Camelot Realty of Brevard	Deposition Testimony for Eunice Elizabeth Wenninger	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Michael Kahn, PA	Plaintiff
2013	Town of Melbourne Beach v Outlaw and Jones Inc.	Deposition & Trial Testimony for Town of Melbourne Beach	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Gray Robinson PA Jack Kirschenbaum	Plaintiff
2013	Don Facciobene, Inc. v Mansion Restaurant	Deposition & Trial Testimony for Don Facciobene, Inc.	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Law Offices of Freese Hansen Allen Whitehead	Defendant
2013	Stephen Long Residence	Deposition Testimony for Slug-A-Bug	Defect/Personal Injury	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Dean Mead	Defendant
2014	Global v Melbourne Airport Authority	Deposition Testimony for Melbourne Airport Authority	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Gray Robinson PA	Defendant
2014	Reme Home	Deposition Testimony for Owner	Construction Defect / Contract Dispute	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Fritz Reme	Plaintiff

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2014	Wagner, Patricia	Deposition Testimony for Owner	Construction Defect / Contract Dispute	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Patricia Wagner	Plaintiff
2014	Willow Creek v Apache Stucco	Deposition Testimony for Apache Stucco	Construction Defect		Johnson Law Group Michael E. Wargo, Esq	Defendant
2014	Midway Contracting	Deposition Testimony for Midway Contracting	Construction Defect	9 <sup>th</sup> Judicial Circuit Court of Florida	Vasquez & Tosko, LLP Jonathon Wright	Defendant
2014	Don Facciobene, Inc. v Mansion Restaurant	Trial Testimony for Don Facciobene, Inc.	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Law Offices of Freese Hansen Allen Whitehead	Defendant
2015	Pure Living @ Heathrow	Deposition Testimony for Defendant/2 <sup>nd</sup> Party Plaintiff	Construction Defect		Luks, Santaniello, Petrillo & Jones Thomas Farrell	Defendant
2015	DR Horton vs Southern Building Products	Deposition Testimony for Defendant	Design Defect	13 <sup>th</sup> Judicial Circuit Court for Hillsborough County	Law office of Jack Evans Teresa Eyeran	Defendant
2015	Crossroads Daycare	Deposition Testimony for Plaintiff	Building Condition	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Dean Mead Kim Rezanka	Plaintiff
2015	Samuel Johnson vs High Reach	Deposition Testimony for High Reach	Personal Injury	13 <sup>th</sup> Judicial Circuit Court for Hillsborough County	Vasquez & Tosko, LLP Jonathon Wright	Defendant
2015	ARKS, LLC	Deposition Testimony for Plaintiff	Subrogation Claim for Fire Damage	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Schwartz Law Group David J. Pascuzzi	Plaintiff
2015	The Peninsula Condo v Professional Plumbing	Deposition Testimony for Defendant	Construction Defect	11 <sup>th</sup> Judicial Circuit Court for Miami Dade County	Ciklin, Lubitz, Martens & O'Connell Christine Hoke	Defendant
2015	Promenade v Monument Stucco	Deposition Testimony for Defendant	Construction Defect		Klein, Glasser	Defendant

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2015	Windsor v Lusk Lathing	Deposition Testimony for Defendant	Construction Defect	9 <sup>th</sup> Judicial Circuit Court for Orange County	Old Dominion Insurance Jeff Bogert	Defendant
2016	Steidle Bros. Construction, Inc.	Deposition Testimony for Defendant	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Vasquez & Tosko, LLP Esteban F. Scornik	Defendant
2016	UDR of Tenn, LP vs Urban Studio	Deposition Testimony for Defendant	Construction Defect	13 <sup>th</sup> Judicial Circuit Court for Hillsborough County	Bush Ross, PA Amanda Buffington, Esq.	Defendant
2016	J A Croson v Osceola Brownstone	Deposition Testimony for Defendant	Construction Defect	9 <sup>th</sup> Judicial Circuit Court for Orange County	Boyd & Jenerette, PA, Beth-Ann Schulman	Defendant
2017	1041 Sunswept Rd, Palm Bay, FL	Deposition Testimony for Defendant	Failure to Disclose	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Fallace & Larkin Dave Larkin	Defendant
2017	Savannah Townhomes, Wyndemere	Deposition Testimony for Defendant	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Seminole County	Amerisure Insurance Jennifer Faircloth	Defendant
2017	Miami Drywall v The Beach Club	Deposition Testimony for Defendant	Construction Defect	17 <sup>th</sup> Judicial Circuit Court for Broward County	The Hartford Kevin Claytor	Defendant
2017	St. Pete vs Hennessey	Deposition Testimony for Defendant	Construction Defect	6 <sup>th</sup> Judicial Circuit Court for Pinellas County	Hill, Rugh, Keller & Main Christopher Hill	Defendant
2017	Long vs Hufford	Trial Testimony for Defendant	Failure to Disclose	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Lewis Brisbois	Defendant
2018	Norman Turner Home	Mediation Testimony for Defendant	Failure to Disclose	19 <sup>th</sup> Judicial Circuit Court for Indian River County	Jones Foster Johnston & Stubbs Michael Gore	Defendant
2018	Villa Verde Condominium	Deposition and Trial for Defendant	Construction/Design Defect	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Gray Robinson Law Trevor Arnold	Defendant

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2018	Randazzo Bldrs v Villas @ Lakes	Deposition for Defendant	Construction Defect	18 <sup>th</sup> Judicial Circuit Court for Seminole County	Ciklin, Lubitz, Martens Christine Hoak	Defendant
2018	Haver v Maclean	Trial Testimony for Plaintiff	Failure to Disclose	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Volk Law Offices David Volk	Plaintiff
2018	Univ of FL Chemical Eng Addit	Deposition for Plaintiff	Construction/Design Defects	8 <sup>th</sup> Judicial Circuit Court for Alachua County	Shutts & Bowen	Plaintiff
2018	Western Waterproofing	Deposition for Plaintiff	Construction Contract Dispute	14 <sup>th</sup> Judicial Circuit Court of Bay County	Boyd & Jenerette, PA Beth-Ann Schulman	Plaintiff
2019	Epic v Miami Drywall & Stucco	Deposition for Defendant	Construction Defect	11 <sup>th</sup> Judicial Circuit Court of Miami-Dade County	Rembold Hirschman	Defendant
2019	Summerhill Apt vs. The Preston Partnership, LLC	Deposition for the Defendant	Construction Defects, Cost to Cure	4 <sup>th</sup> Judicial Circuit Court of Duval County, FL	Gray Robinson Trevor Arnold	Defendant
2019	Lakes of Windermere – Lake Reams Townhomes v Aston Orlando v Del Air, Energy Air, Maximum Air, American Builders Supply, Spraggins, Inc.	Deposition	Construction Defects	9 <sup>th</sup> Judicial Circuit Court for Orange County	Boyd & Jenerette, PA Beth-Ann Schulman	Defendants
2020	UF-CTRB	Deposition	Construction Defects	8 <sup>th</sup> Judicial Circuit Court for Alachua County	Gray Robinson Trevor Arnold	Plaintiff
2020	Spring Isle v Pulte Home – American Window	Deposition	Construction Defects Sliding Glass Doors	9 <sup>th</sup> Judicial Circuit Court for Orange County	Boyd & Jenerette, PA Beth-Ann Schulman	Defendant
2020	Regalia v Miami Drywall	Deposition	Construction Defects Drywall, Metal Studs, Stucco, Showers water intrusion	11 <sup>th</sup> Judicial Circuit Court of Miami-Dade County	Rembold Hirschman	Defendant

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2020	Alfred and Joan Suarez v VB Custom Homes	Deposition / Trial Testimony	Construction Defects Contract, Plans, workmanship	19 <sup>th</sup> Judicial Circuit Court for Indian River County	Fallace & Larkin David Larkin	Plaintiff
2020	Paradise Palms Resort HOA v C&C Windows	Deposition	Construction Defects Windows	9 <sup>th</sup> Judicial Circuit Court for Osceola County	Wright, Fulford, Moorehead & Brown Sharon Freeman	Defendant
2020	Osborne v Vanacore	Deposition / Arbitration Testimony	Construction Defects Stucco and Windows	7 <sup>th</sup> Judicial Circuit Court for Volusia County	KGPLP Houston S. Parks III	Defendant
2020	Mesa-Taylor v Gale Insulation	Deposition	Construction Defects	15 <sup>th</sup> Judicial Circuit Court for Palm Beach County	Boyd & Jenerette Elizabeth Lefforge	Defendant
2020	Palau v Century Tile	Deposition	Construction Defect tile installation	11 <sup>th</sup> Judicial Circuit Court of Miami-Dade County	Law Offices of Santeiro & Garrison Christine Hoke	Defendant
2020	Martin, Lizzeta and Scott v Federated Insurance	Deposition	Water damage while under construction	18 <sup>th</sup> Judicial Circuit Court for Brevard County	O'Conner & O'Conner, PA Ronald Harrop	Defendant
2020	Palau v Century Tile	Deposition	Exterior Tile Construction Defect	11 <sup>th</sup> Judicial Circuit Court of Miami-Dade County	Law Offices of Santeiro & Garrison Christine Hoke	Defendant
2020	WMR Fountain Park	Deposition	Design Defects	18 <sup>th</sup> Judicial Circuit Court for Brevard County	Gray Robinson Trevor Arnold	Defendant
2020	Osborne, Royal v Vanacore	Deposition Arbitration Testimony	Construction Defects	7 <sup>th</sup> Judicial Circuit Court of Volusia County	Klien Glasser Park & Lowe Houston S Park III	Defendant
2021	Compass Group Springhill Suites NSB	Deposition	Hardi Siding	7 <sup>th</sup> Judicial Circuit Court of Volusia County	Boyd Jenerette Beth-Ann Schulman	Defendant/Plaintiff
2021	Commercial Stucco Englewood Senior Living Pensacola	Deposition	Stucco Construction Defects	1st Judicial Circuit Court of Escambia County	Boyd Jenerette Beth-Ann Schulman	Defendant

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2021	Price Family Homes v Mallet	Deposition and Trial Testimony (2022)	Construction Defects Retainage Held	18 <sup>th</sup> Judicial Circuit of Brevard County	David Larkin Fallace & larkin	Plaintiff
2021	Dassa v SE Power	Deposition	Personal Injury	18 <sup>th</sup> Judicial Circuit of Brevard County	David Gordon High Stack	Plaintiff
2021	UF – CTRB	Deposition	Construction/Design Defects	8 <sup>th</sup> Judicial Circuit Court for Alachua County	Trevor Arnold Gray Robinson	Plaintiff
2021	Miller v DR Horton Fairway Lakes	Deposition	Construction Defects Site	18 <sup>th</sup> Judicial Circuit of Brevard County	Scott Blaue	Plaintiff
2021	Kelly Riccard v MI Homes	Deposition	Construction Defects	18 <sup>th</sup> Judicial Circuit of Seminole County	Robert W Rasch	Plaintiff
2022	Villanova HOA v Dehlinger Construction	Deposition	Construction Defects Payment withheld	9 <sup>th</sup> Judicial Circuit Court for Orange County	Resnick & Lewis Joshua Rhea	Plaintiff