



LSN GOVERNMENT AFFAIRS  
Local \* State \* National

May 26, 2020

Ms. Brenda J. Billingsley, Director  
Broward County Purchasing Division  
115 South Andrews Avenue, Rm. 212  
Fort Lauderdale, FL 33316

Re: Broward County Bid PNC2119546P1 Managing General Contractor for OMETS and BSO Crime Laboratory Combined Facility

Dear Ms. Billingsley:

Our firm represents The Robins & Morton Group ("RMG") in response to PNC2119546P1 Managing General Contractor for OMETS and BSO Crime Laboratory Combined Facility. DPR Construction ("DPR") was ranked number one and RMG was ranked second in scoring for this solicitation which sought a qualified firm to provide GC services to the County. Please accept this letter of new information related to procedural issues and items not presented to or considered by the Evaluation Committee (EC) prior to scoring this solicitation.

## ACCREDITATION

### ASSERTION #1:

According to the RFP, Accreditation credentials, experience and capabilities are deemed by the County to be an essential element as expressly set forth in the Evaluation Criteria outlined below.

DPR's initial response to the solicitation failed to reflect the requisite capabilities, competency or experience relative to the myriad of Accreditation categories set forth in the Evaluation Criteria. Nor was there any proposed Accreditation consultant or subcontractor listed in the initial DPR submittal. Only after DPR had an opportunity to review the competing proposals and to hear the Initial EC Meeting participants ask that the Accreditation be addressed during the presentations did DPR seek to add Crime Lab Designs to the DPR team on the day of the presentation.

This assertion of new information focuses on three related issues:

1. DPR's complete absence of capability, competency and experience relating to Accreditation in its initial response to the solicitation;
2. The inappropriateness of adding a "new" consultant on the day of the presentation deprived County Staff of an opportunity to vet the new firm's credentials and resulted in an unfair advantage to DPR as it sought to seek to overcome its accreditation deficiency; and
3. The inappropriateness of allowing EC members to consider the credentials of DPR's new consultant ("*Supplemental Accreditation Recommendation*") when ranking the companies in the Final EC meeting. This violated County procedures and gave an unfair advantage to DPR.

The Solicitation for this project includes the following pertinent language regarding Accreditation:

\* The word accreditation is highlighted throughout this document to emphasize its importance and how often it was used by the County in seeking qualified vendors. It is also highlighted when DPR attempts to subsequently address it in during the presentation after omitting the criteria in their submittal.

### SCOPE OF WORK AS DESCRIBED IN SOLICITATION

The new facility is intended to achieve **Accreditations** for forensic toxicology through the American Board of Forensic Toxicologists (ABFT) and Federal Standards under ANSI National **Accreditation** Board (ANAB, ISO 17025 Standards) and Quality Assurance Standards by the ANSI National **Accreditation** Board, National Association of Medical Examiners (NAME) and International Association of Coroners and Medical Examiners (IACME), International Association of Coroners and Medical Examiners (IACME), and American National Standards Institute (ANSI) National **Accreditation** Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125, at a minimum. (page 5. Bid PNC2119546P1 Solicitation)

### 3. PAST PERFORMANCE: MAXIMUM 25 POINTS

a. Describe MGC's experience on projects of a comparable nature, scope, complexity and duration, along with evidence of satisfactory completion, both on time and within budget, for the past SEVEN (7) years. Provide a minimum of three projects. Include the following for each project: (20 Points)

1. Project name
2. Location
3. Size (construction gross square feet)
4. Construction Cost
5. BIM use and extent of BIM services.
6. Experience with **accreditation** agencies such as the American Board of Forensic Toxicologists (ABFT), National Association of Medical Examiners (NAME) and International Association of Coroners and Medical Examiners (IACME), among others.
7. For crime forensics, American National Standards Institute (ANSI) National **Accreditation** Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125.
8. Date of completion, (month, year)
9. Company role and responsibility for the project
10. List MGC's project manager and other key personnel involved on the project.
11. Provide references (See 3b. below), including contact name, title, organization, address, phone and email address for all cited projects completed and active.

### 4. PROJECT APPROACH: MAXIMUM 25 POINTS

a. Describe the MGC's project approach to deliver successful pre-construction services for this specialized building type. Include topics such as cost estimating, value engineering, scheduling, best practices, Building Information Modeling (BIM), constructability review, permitting and bidding in accordance with the Managing General Contractor agreement. (10 Points)

b. Describe the MGC's project approach to deliver successful managing general contractor services. Include topics such as coordinating and constructing multi-level including specialized systems, parking garages, in urban

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settings, and assisting in the accreditation processes, commissioning and transitioning from existing to new facilities. (15 Points)

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From the express language of the solicitation document and the above-cited Evaluation Criteria, it was clear that the issue of Accreditation was and is of critical importance to the success of the project. This was further emphasized during the Initial Evaluation Committee Meeting, when *EC Member, Dr. Robinson*, expressly asked that the following topic be addressed by the vendors in their presentations: *Since the County's OMETS has scientific accreditations to maintain, will the firms have subject matter experts available should issues of accreditation compliance arise?* (Initial Evaluation Meeting Minutes Attached)

DPR did not present any capability or reference to providing Accreditation in its initial solicitation response despite it being requested in two above-cited Evaluation Criteria categories. Prompted by the EC Member's question and the realization that it was not addressed in their submittal, DPR sought to add a brand new unvetted subconsultant into the Construction Management team during the actual presentation to bolster their inadequacies on accreditation. Not only did the addition of this subconsultant substantially alter the proposal initially presented to Broward County, but Crime Lab Design's credentials were never presented to, or evaluated by Broward County staff to ensure legal and other matters of compliance as they were not disclosed as a subconsultant in the submittal. In fact, DPR responded to the Subcontractors/Subconsultant/Suppliers Requirement Form's request with NONE (attached). By declaring none, the Vendor did not confirm that their subcontractor's principal(s), officer(s), affiliate(s) or any other related companies had not been debarred from doing business with Broward County or any other governmental agency as required by the Form. nor should they have been allowed to after the fact insert a new team member solely to claim competencies they clearly did not have.

Copies of all vendors proposals were uploaded to the Broward County Purchasing RFP/RLI Repository on January 22, 2020, more than three months prior to vendor presentations. This provided DPR with the benefit of determining their submission was deficient in the Accreditation issue. During presentations, DPR's *Johnathon Whitney* represented that Crime Lab Design would be DPR's subcontractor to provide accreditation.

DURING DPR's PRESENTATION: OMETS & BSO CRIME LAB PRESENTATION SLIDE *Johnathon Whitney* states (31:45):

"One important note here, the specialties and equipment that you see here in the middle, um, an additional question that we were asked to focus on had to do with the accreditation process, ah, and our solution to that in fact having worked with Crime Lab Design in the past on other projects and their ability to speak towards the, uh, American Board of Forensic Toxicology and their requirements so that we could keep that accreditation for Broward County. We would propose that they would work as a consultant to DPR throughout the (1) preconstruction phase, (2) helping as a second pair of eyes, (3) a third pair of eyes as we work toward design, (4) assisting us in the commissioning of the building and (5) working through any bit of kinks so that as the facility opens we are ready to go." **(Bold Emphasis Added.)**

*Johnathon Whitney* assigns 5 Construction Management tasks for Crime Lab Designs in the presentation despite that firm not being included in the DPR proposal.

Later in the presentation, in response to a question, DPR's *Sarah Wilkins* states (42:38):

Other specialty systems in this building including items like the firing range, or the bullet recovery tank, or the drug vault, or various other specialty components, so that's going to be something we look at with the particular department heads and user groups, um, early along with Leo Daly and um Crime Lab Design if they become our consultant for this project, but, so there is only a couple of manufacturers for those types of systems. (Emphasis Added)

Aside from the fact that DPR should not have been allowed to bring this new consultant on the day of the presentation, *Ms. Wilkins* raises the question as to whether Crime Lab Design will in fact be a consultant on the project through the use of the word "if" in her statement, nonetheless, the EC scoring appears to have given DPR points on the issue of accreditation.

#### Supplemental Accreditation Recommendation

During the Presentation at (57:45) of the recording Q&A, *EC Member Kim Campbell* asks:

"I would like to know, so your proposal says you didn't work directly with accreditation agencies, so I am just curious as to how the building design is informed by the standards that accrediting bodies impose upon us such that it is easier for us to maintain our accreditation. If you don't work directly with them."

Ryan Romanchuck of DPR hands it off to other team members acknowledging their Supplemental Accreditation Recommendation. (58:12)

*Johnathon Whitney* of DPR States (58:20):

"On the design team with Leo Daly we believe they most certainly have a lab designer familiar with that accreditation process built into the design.

What we propose is to employ the consulting resources of yet another design team, Crime Lab Design, with whom we have worked with in the past. Um, and what they would do is aid us in the review of details, um, some of the initial adjacencies, and help with the workflow and protocols that you have already established with Broward County. So, what we may in fact do is perhaps request, um, taking a look at some of those protocols and processes that are currently in place and currently working well and work towards helping to integrate them with the design team as they design your new facility.

Additionally, Crime Lab Design would be a part of, um, helping us to monitor construction and again details as they materialize in the field, and that we would work as a group well in advance of anybody moving into the facility, but to walk through what the accreditation group would be looking for again as a collaborative effort with Leo Daly and their consultants so that once the commissioning process took place within the new facility, um, Broward County could move in begin to get up and running and within a short time thereafter, ah, be able to slide that accreditation over to the new facility.

*Sarah Wilkins* from DPR responds:

And speaking from my experience from the San Diego Crime Lab, um, while we weren't directly involved with the accreditation of that process, or of the lab, um, because the county actually hired their own consultants for that piece. Um, the two key things, um, that go into the accreditation process are both the design of the facility and the operation side of that facility. So, um, obviously, um, as Johnathon mentioned, um, you know, engaging with a subconsultant such as Crime Lab Design to help maybe with some peer review, but also bringing our own experience from the GBI San Diego Crime Lab, um, and our lab experience to the table, but also, um, on the operation side, um, to ensure that the building, um, operates the way it needs to over time. We put together a very detailed, um, information through the use of our models, um, and can that can be turned over so that you operations and facility staff, um, are well versed in how all the systems work within the building to ensure that it operates the way it needs to maintain that accreditation.

For more than 10 minutes during Q&A, DPR displayed an ancillary presentation slide not included in the materials given to Broward County or uploaded to the RLI/RFP Repository as part of their presentation materials. That slide was titled:

### **Confident Accreditation**

*Improving the integrity of your evidence for a successful accreditation review. (Exibits)*

Yet, DPR did not submit any past performance or approach to the project in regard to its ability to help Broward achieve Accreditation. This presentation slide was an attempt to make the Evaluation Committee feel confident DPR adequately addressed accreditation capabilities and experience in the materials presented to Broward County while none were actually included in their solicitation response.

DPR's submittal was clearly deficient in its failure to provide credentials of experience and capabilities of accreditation under the Evaluation Criteria for Past Performance and Project Approach. Once prompted, DPR unfairly inserts Crime Lab Design's credentials into its presentation while avoiding vetting by County staff and absent any indication that Crime Lab Design will even be on the DPR team. DPR's presentation introducing new information and inappropriately adding significant team members should not have been considered to be part of its solicitation response. Any of the multiple Evaluation Point Categories which considered Accreditation are tainted in the scoring response. Broward County should not allow proposers to receive points and credit for core competencies required by the RFP and the Evaluation Criteria when the proposal is devoid of such competencies and only claimed through the last minute addition of a third party subcontractor not included or vetted in an applicant's proposal. This is supported by case law. No submissions made after the bid or proposal opening that amend or supplement are to be considered by the agency. Thus, a bidder cannot change a bid after the bid has been opened, except to cure "minor" irregularities. Harry Pepper & Assoc. v. Cape Coral, 352 So. 2d 778 (Fla. 1st DCA 1981). DPR's effort to add Crime Lab Design at the presentation was an unauthorized effort to cure a major deficiency in its proposal.

**ASSERTION #2:** *Staff Matrix provided to EC Members failed to indicate DPR's submittal was deficient in providing examples of Accreditation experience in Past Performance or addressing Accreditation in Project Approach.*

This table more accurately reflects DPR's lack of response to accreditation not properly reflected in the Staff Matrix.

**RESPONSE TO REQUEST FOR ACCREDITATION EXPERIENCE FROM THE SOLICITATION**

MATRIX Evaluation Category	MATRIX Response	Project Info ACTUALLY Listed within Submittal	DPR Solicitation ACTUAL Accreditation Response on Pages 41 to 55
<b>3) Past Performance: Maximum 25 Points</b>	<b>DPR Construction, Inc.</b>		
a. 6. Experience with accreditation agencies such as the American Board of Forensic Toxicologists (ABFT), National Association of Medical Examiners (NAME) and International Association of Coroners and Medical Examiners (IACME), among others. 7. For crime forensics, American National Standards Institute (ANSI) National Accreditation Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125.	<b>Requested information provided:</b> VENDOR MATRIX RESPONSE: a) See pages 41 to 50 (electronic PDF file e numbers). There are (5) projects listed. COUNTY MATRIX RESPONSE: <b>Yes</b>	Savannah Regional Crime Laboratory	<b>EXPERIENCE WITH ACCREDITATION AGENCIES</b> <u>DPR did not directly work with accreditation agencies.</u> Crime Lab Designs ensured DPR was meeting lab requirements for accreditation. DPR's contact with Crime Lab Designs is Nerissa Jemmotte, Crime Lab Designs, 404-960-0078
a. 6. Experience with accreditation agencies such as the American Board of Forensic Toxicologists (ABFT), National Association of Medical Examiners (NAME) and International Association of Coroners and Medical Examiners (IACME), among others. 7. For crime forensics, American National Standards Institute (ANSI) National Accreditation Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125.	Requested information provided: VENDOR MATRIX RESPONSE: a) See pages 51 to 55 (electronic PDF file page numbers) COUNTY MATRIX RESPONSE: <b>Yes</b>	Academic Health Center 4	<b>EXPERIENCE WITH ACCREDITATION AGENCIES</b> <u>DPR did not directly work with accreditation agencies.</u>
a. 6. Experience with accreditation agencies such as the American Board of Forensic Toxicologists (ABFT), National Association of Medical Examiners (NAME) and	Requested information provided: <b>Yes</b> a) See pages 51 to 55 (electronic PDF file page numbers)	Coral Springs Bed Tower Expansion	<b>EXPERIENCE WITH ACCREDITATION AGENCIES</b>

<p>International Association of Coroners and Medical Examiners (IACME), among others. 7. For crime forensics, American National Standards Institute (ANSI) National Accreditation Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125.</p>			<p><u>DPR did not directly work with accreditation agencies.</u></p>
<p>a. 6. Experience with accreditation agencies such as the American Board of Forensic Toxicologists (ABFT), National Association of Medical Examiners (NAME) and International Association of Coroners and Medical Examiners (IACME), among others. 7. For crime forensics, American National Standards Institute (ANSI) National Accreditation Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125.</p>	<p>Requested information provided: <b>Yes</b> a) See pages 51 to 55 (electronic PDF file page numbers)</p>	<p>Vivex Center</p>	<p><b>EXPERIENCE WITH ACCREDITATION AGENCIES</b> <u>DPR did not directly work with accreditation agencies.</u></p>
<p>a. 6. Experience with accreditation agencies such as the American Board of Forensic Toxicologists (ABFT), National Association of Medical Examiners (NAME) and International Association of Coroners and Medical Examiners (IACME), among others. 7. For crime forensics, American National Standards Institute (ANSI) National Accreditation Board (ANAB) under ISO/IEC 17025:2017, in compliance with the AR3125.</p>	<p>Requested information provided: <b>Yes</b> a) See pages 51 to 55 (electronic PDF file page numbers)</p>	<p>San Diego Sheriff's Crime Laboratory</p>	<p><b>EXPERIENCE WITH ACCREDITATION AGENCIES</b> <u>DPR did not directly work with accreditation agencies.</u></p>
<p><b>4. Project Approach: Maximum 25 Points</b> a. Describe the MGC's project approach to deliver successful pre-construction services for this specialized building type. Include topics such as cost estimating, value engineering, scheduling, best practices, Building Information Modeling (BIM), constructability review, permitting and bidding in accordance with the</p>	<p>Requested information provided: <b>Yes</b> b) See pages 56 to 60 (electronic PDF file page numbers)</p>	<p>No specific project</p>	<p><b>DPR's ACTUAL Project Approach on pages 56-60</b> <u>No reference to accreditation capabilities in Project Approach.</u></p>

<p>Managing General Contractor agreement. (10 Points)</p> <p>b) Describe the MGC’s project approach to deliver successful managing general contractor services. Include topics such as coordinating and constructing multi-level laboratory/forensic facilities, including specialized systems, parking garages, in urban settings, and assisting in the accreditation processes, commissioning and transitioning from existing to new facilities. (15 Points) <u>(6 Items Noted)</u></p>			
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By summarizing these tables as “Information Provided” when there was not actual information provided to demonstrate the capability or experience, the County Staff Matrix gave EC Members the false impression that the firm fulfilled that requirement of the RFP. Crime Lab Design was named as providing the accreditation services on one of the projects, signifying that DPR lacked the experience themselves. DPR’s solicitation response clearly indicates that there are no subcontractors on the DPR Team, and therefore, DPR should not have been deemed to have “provided the required information” There were EC Members who gave DPR perfect scores in evaluation categories in which Accreditation was one of the categories despite DPR not having the competency included in its proposal.

## LITIGATION

**ASSERTION #3:** *Litigation review performed by the County was deficient. (1) Not all cases were cited in the Staff Matrix, unclear if all were reviewed by County Attorney. (2) DPR failed to report a material case in Florida in its litigation disclosures.*

Due to the way DPR’s proposal was uploaded to BidSync, the litigation disclosed by DPR was not fully reviewed by Staff. DPR uploaded 9 cases in their submittal package with one listed later in the submittal, but only 8 were listed as reviewed in the Staff Matrix. The Litigation Review Memorandum was an uncharacteristically short summary memo with no specific review of each proposer’s submittal or cases. This raises uncertainty whether all cases were reviewed in the preparation of the Memorandum of Responsiveness and Responsibility given the discrepancy in the Matrix to the number of cases cited.

A quick Google search revealed a material case undisclosed by DPR in the State of Florida. The solicitation requires all vendors:

to disclose to the County all “material” cases filed, pending, or resolved during the last three (3) years prior to the solicitation response due date, whether such cases were brought by or against the Vendor, any parent or subsidiary of the Vendor, or any predecessor organization.

**Assertion:** *DPR did not disclose material cases to Broward County.*

Undisclosed by DPR Construction is a material case in Hillsborough County, FL. Please find the EXHIBITS for Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC. DPR is listed as a Defendant in a lawsuit which **claims construction defects** for a signature condominium project in Tampa. The sinking building's defects have been the subject of substantial media attention, that claim the building has been "plagued with problems." This disconcerting and material case in the State of Florida was not cited in the litigation disclosures by the vendor.

## VIVEX PROJECT'S MISLEADING LISTING IN PAST PERFORMANCE

**ASSERTION #4:** *There are discrepancies in the DPR information shared with Staff and the EC in reference to the Vivex Project. The project should not have been listed or considered as Past Performance if the project is not complete.*

In Evaluating DPR's submittal that was uploaded to the Broward County RFP/RLI Repository, it was observed there were discrepancies from an earlier upload of the DPR submittal to the Repository. We reached out to the Purchasing Agent assigned to the submittal to understand this discrepancy. Purchasing Supervisor Constance Mangan responded:

"The original packet was generated from BidSync and had formatting issues (ex. references were cutoff). After the issue was discovered, we downloaded the individual files from BidSync (the files uploaded by the vendor instead of having the BidSync system generate a combined pdf file). I believe the original file posted had the cutoff forms from the packet."

It is unclear which of these documents were evaluated by Staff for Responsiveness and Responsibility Review or provided to the Evaluation Committee. We have requested email correspondence of staff related to this procurement to ascertain what documents were shared but have not yet received that information. There is a Vendor Reference Verification Form for the Vivex Biologics project missing from the final upload which was partially visible in the initial upload to the RFP/RLI Repository. This raises concerns for reconciling the documents and their recipients. While DPR included more than the required 3 projects for Past Experience, the Vivex project was listed in Past Experience with a completion date of November of 2019, yet during the presentation this project was described as still ongoing. Thereby, the omission of the Vendor Reference Verification Form obfuscates whether this project should have been included in Past Experience. If the project was not complete it should not have been included in Past Experience and the omission or only partial view of the Vendor Reference Verification Form obfuscated that the project was incomplete and was misleading to have been considered or presented in the Past Performance experience of DPR in which 25 points are assigned for the Evaluation Criteria. This project was clearly and strategically included to bolster their medical credentials in South Florida yet, DPR's own admission in the presentation claims it is incomplete and therefore should not have been considered under Past Performance where it was listed in the proposal.

## Conclusion

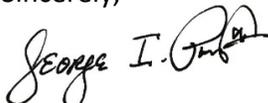
There are serious flaws and procedural issues which should be considered and addressed in this evaluation.

Whether intentional or not, the EC relied upon misrepresentations relative to DPR's credentials and experience on the Accreditation Evaluation Criteria. It is also a violation of County policy and the Procurement Code to allow a vendor to unilaterally add a significant new and unvetted team member at the last minute as part of its presentation. The assertions made in this objection letter have created an unfair advantage for DPR and have seemingly undermined and tainted the scoring.

We extend our professional courtesy during this difficult time in our Nation's history and note that not all processes are able to run at optimal levels, however, we believe the deficiencies in the process and the deviations from State and County law and procedures warrant the Director of Purchasing's consideration to overturn this recommendation.

I submit this letter to the Director of Purchasing with its attachments and My Client and I attest that all statements made in support of the submission are accurate, true, and correct. We respectfully ask the Director of Purchasing to reconvene the Evaluation Committee and direct the Evaluation Committee on the proper procedure to disqualify DPR for tainting the procurement process by substantially altering their proposal submission during the presentation.

Sincerely,



George I. Platt

**Summary Meeting Minutes  
INITIAL EVALUATION MEETING**

**Managing General Contractor for OMETS and BSO Crime Laboratory Combined Facility  
RFP No. PNC2119546P1**

**Date:** April 13, 2020 **Time:** 11:00 A.M.

**Location:** Virtual Meeting via Skype  
(954) 453-1630  
Conference ID: 3313450

**Attendees:**

Mark Roberts, Purchasing Agent, Senior, Purchasing Division, Finance and Administrative Services Department (**Chair and Non-Voting Member**)

**Evaluation Committee (EC) Members: (Voting Members)**

Kimm Campbell, Assistant County Administrator, County Administration

Dr. Stephen Robinson, Deputy Chief Medical Examiner, Office of Medical Examiner & Trauma Services (OMETS)

Tracy Jackson, Director, Regional Emergency Services & Communications

Jeffrey Thompson, Assistant Director, Construction Management Division, Public Works Department

Major Robert Schnakenberg, Criminal Investigations/Forensic Services, Broward Sheriff's Office (BSO)

**County Staff:**

David Hawke - Construction Management Division (Project Manager)

Fernando Amuchastegui - County Attorney's Office

Ben Crego - County Attorney's Office

Lori Fortenberry – Finance and Administrative Services Department

Colleen Pounall - Risk Management Division

Oswaldo Casco – Office of Economic and Small Business Development

The meeting was called to order 11:08 a.m. and announcements were made by the Chair.

The Chair made an announcement that due to necessary precautions related to the recent COVID-19 virus outbreak, this meeting is being held through audioconferencing system, Skype, which could be accessed by phone or computer.

The Purchasing Division representative introduced County Staff, made some introductory comments about the solicitation, and noted that the meeting had been publicly noticed.

The Chair stated that quorum requirements for committee members being required to meet in person and at a specific public place had been suspended by combination of both the Governor's Executive Order 20-69 and the Board of County Commission's Resolution 2020-128 which allowed the meeting to be held using communications media technology, including telephonic and video conferencing.

The Chair stated that a quorum present and confirmed attendance of Committee members by a roll call vote.

The Chair stated the responsibility of the Evaluation Committee.

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The Chair stated the purpose of the Initial EC meeting.

The Chair stated that all firms that are determined to be both responsive and responsible will move on to final evaluation to be scored and the highest scored firm will become the number one ranked firm that will be recommended for award.

The Chair stated that attendance would be recorded for the Skype meeting in two ways:

1. if logging in by computer, send chat message of name, company, and title.
2. Attendance by phone only – send e-mail to the assigned Purchasing Agent (with subject: EC Meeting Attendance)

The Chair stated that the Cone of Silence for this project has been in effect since January 16, 2020 for County Staff and upon the first meeting of the Evaluation Committee for County Commissioners and their staff; and all inquiries should be directed to the Project Manager, Mr. David Hawke, or the Director of Purchasing.

The Chair stated that in accordance with Broward County Procurement Code all Committee Members shall be free of conflicts of interest.

The Chair then called on the Purchasing Division to report on their findings about responsiveness and responsibility of the firms' submittals.

The Purchasing representative stated the responsiveness requirements and named the proposing firms that were recommended to be evaluated as responsive to the requirements.

The Purchasing representative stated the responsibility requirements and named the proposing firms that are recommended to be evaluated as responsible to the requirements.

The Purchasing representative reported exceptions to the County's standard terms and conditions of the responsive and responsible proposers; and stated any specific exception(s) taken by the firm would be addressed, for all responsive and responsible firms, prior to presentations at the Final Evaluation Meeting.

The Chair gave the definition of responsiveness and asked for a motion. Motion was made by Mr. Thompson to find all firms responsive, motion was seconded by Ms. Campbell, all other EC members signified same by saying aye, and motion passed unanimously.

The Chair gave the definition of responsibility and asked for a motion. Motion was made by Mr. Thompson to find all firms responsible, motion was seconded by Mr. Jackson, all other EC members signified same by saying aye, and motion passed unanimously.

The Chair asked for a motion of determination of firms to proceed to final evaluation. Motion was made by Major Schnakenberg to have all four firms to proceed to final evaluation, motion was seconded by Mr. Thompson, all other EC members signified same by saying aye, and motion passed unanimously.

The Chair announced that the Final Evaluation Meeting would be held on Friday, May 1, 2020 at 1:30 PM using communications media technology (i.e. Skype teleconference).

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The Chair stated that the length of vendor presentation is established by the Evaluation Committee and he asked if was any discussion from the EC regarding length of presentations?

After discussion by the EC, the members agreed upon 15-minute presentations by the firms. Motion was made by Mr. Thompson to set the length of presentation to 15 minutes, seconded by Major Schnakenberg, all other EC members signified same by saying aye, and motion passed unanimously.

The Chair asked Purchasing Division staff select the Order of Presentations for the Final Evaluation Committee by using a random list generator, which was viewed on shared screen. The order of vendor presentations results was announced as follows:

**First Presenter: DPR Construction, Inc.**  
**Second Presenter: The Whiting-Turner Contracting Co.**  
**Third Presenter: The Weitz Company, LLC**  
**Fourth Presenter: The Robins & Morton Group**

The Chair asked each EC member if there were any questions or topics that they wish to have included or specifically addressed in the presentations.

The Chair recognized Ms. Campbell who had the following topics for the vendors to address:

1. Address the firm's capacity for completion of the work given other projects each of the firms currently have going.

The Chair recognized Dr. Robinson who had the following topics for the vendors to address:

1. Since the County's OMETS has scientific accreditations to maintain, will the firms have subject matter experts available should issues of accreditation compliance arise?

The Chair recognized Mr. Thompson who had the following topics for the vendors to address:

1. Given that some of the firms have constructed similar facilities with their proposed local team, and other firms citing experience in other states, how will this corporate knowledge be incorporated into the firm's local day-to-day planning, decision making, and general experiential knowledge for this unique construction project?
2. Due to the unique nature of this project, what special lessons learned will your firm bring to this project development and construction process?

EC members, Mr Jackson and Major Schnakenberg, had no specific questions or topics or were previously addressed by the other EC members questions.

The Chair asked if there was any other business to discuss. Purchasing's Connie Mangan, Purchasing Manager, stated that additional instructions would be forthcoming to the vendors regarding how vendor closed presentations would be conducted in a Skype environment and that Purchasing staff would be contracting each presenting firm to perform connectivity testing and screen sharing capability of the Skype application in advance of the Final EC meeting.

As there was no other business to discuss, the Chair adjourned the meeting at 11:32 a.m.



**SUBCONTRACTORS/SUBCONSULTANTS/SUPPLIERS REQUIREMENT FORM**  
**Request for Proposals, Request for Qualifications, or Request for Letters of Interest**

The following forms and supporting information (if applicable) should be returned with Vendor's submittal. If not provided with submittal, the Vendor must submit within three business days of County's request. Failure to timely submit may affect Vendor's evaluation.

- A. The Vendor shall submit a listing of all subcontractors, subconsultants and major material suppliers (firms), if any, and the portion of the contract they will perform. A major material supplier is considered any firm that provides construction material for construction contracts, or commodities for service contracts in excess of \$50,000, to the Vendor.
- B. If participation goals apply to the contract, only non-certified firms shall be identified on the form. A non-certified firm is a firm that is not listed as a firm for attainment of participation goals (ex. County Business Enterprise or Disadvantaged Business Enterprise), if applicable to the solicitation.
- C. This list shall be kept up -to-date for the duration of the contract. If subcontractors, subconsultants or suppliers are stated, this does not relieve the Vendor from the prime responsibility of full and complete satisfactory performance under any awarded contract.
- D. After completion of the contract/final payment, the Vendor shall certify the final list of non-certified subcontractors, subconsultants, and suppliers that performed or provided services to the County for the referenced contract.
- E. The Vendor has confirmed that none of the recommended subcontractors, subconsultants, or suppliers' principal(s), officer(s), affiliate(s) or any other related companies have been debarred from doing business with Broward County or any other governmental agency.

If none, state "none" on this form. Use additional sheets as needed. Vendor should scan and upload any additional form(s) in BidSync.

1. Subcontracted Firm's Name:

Subcontracted Firm's Address:

Subcontracted Firm's Telephone Number:

Contact Person's Name and Position:

Contact Person's E-Mail Address:

Estimated Subcontract/Supplies Contract Amount:

Type of Work/Supplies Provided:

2. Subcontracted Firm's Name:

Subcontracted Firm's Address:

Subcontracted Firm's Telephone Number:

The image is a screenshot of a Zoom meeting. On the left side, there is a video feed of a woman with blonde hair, wearing a dark top, who appears to be speaking. The main part of the screen displays a presentation slide. The slide features a photograph of a modern office interior with desks, chairs, and large windows. Overlaid on the image is the text "Compliant Accreditation" in a large, white font, with a smaller subtitle below it: "Improving your strategy of your evidence for a successful accreditation review". In the top left corner of the slide, the logo for "online hub design" is visible. At the top of the slide, there are navigation links: "PROJECTS SERVICES OFFICE NEWS". The presentation software interface is visible at the bottom of the slide, showing a slide navigation bar with thumbnails for slides 22 through 29. The Zoom interface includes a top bar with a timer showing "1:01:36", a mute icon, a chat icon, and a "4:57:58" timestamp. A "Click to add notes" button is located at the bottom right of the slide area.



# Vivex Biologics

## Vivex Center of Vivexcellence

Miami, FL



### PROJECT DESCRIPTION

This project consists of a 75,000-sq.-ft. biomedical manufacturing facility. The scope includes 40,000-sq.-ft. of clean room, research & development, freezer storage, and 30,000-sq.-ft. of misc office/admin support spaces. This new facility will expand on Vivex Biomedical's pursuit of becoming an industry leader in regenerative medicine. Today, Vivex focuses on core products and new technologies to meet the ever-growing biologic needs of surgeons and patients while continuing their 45-year history of serving and honoring both tissue donors and recipients. Since their acquisition of University of Miami's Tissue Bank, they have distributed more than 2 million tissue allografts to 18 countries worldwide to better serve the needs of patients.

### BIM USE AND EXTENT OF BIM SERVICES

DPR used BIM to the fullest extent on this project including

- Revit Model Development
- Clash Detection
- Weekly MEP Coordination
- Final As-Builts

### EXPERIENCE WITH ACCREDITATION AGENCIES

DPR did not directly work with accreditation agencies.

### Crime Forensics/ANSI/ANAB

No

### Customer

Vivex Biologics

### Architect

Stantec

### Project Value

\$25,000,000

### Project Dates

May 15, 2019 - November 15, 2019

### Square Footage

75,000

### Company Role

General Contractor

### Key Personnel

Aric Priesendorf -

Project Executive

Ryan Colleran - Project  
Manager

Broward County Board of  
County Commissioners

PNC2119546P1

\_\_\_\_\_  
*Miguel Boschetti – Superintendent*



Ve

Broward County Solicitation No. and Title:  
PNC2119546P1 - Managing General Cont

Reference for: DPR Construction

Organization/Firm Name providing reference:  
Vivex Biologics, Inc.

Contact Name: Tim Maye

Contact Email: [tmaye@vivex.com](mailto:tmaye@vivex.com)

Name of Referenced Project: Center of Viv

Contract No. \_\_\_\_\_ Date Service  
02/22/2020

Vendor's role in Project:  Prime Vendor

Would you use this vendor again?  Yes  No

**Description of services provided by Vendor:**

General Contractor for the build out of our new m  
testing areas, and office space.

**Please rate your experience with the  
referenced Vendor:**

1. Vendor's Quality of Service
  - a. Responsive
  - b. Accuracy
  - c. Deliverables
2. Vendor's Organization:
  - a. Staff expertise
  - b. Professionalism
  - c. Turnover
3. Timeliness of:
  - a. Project
  - b. Deliverables
4. Project completed within budget
5. Cooperation with:
  - a. Your Firm
  - b. Subcontractor(s)/Subconsultant(s)
  - c. Regulatory Agency(ies)

**Additional Comments:** (provide on additional sheet if needed)

We are currently tracking to budget, but the proje

\*\*\*THIS SE

Verified via: \_\_\_EMAIL\_\_\_VERBAL\_\_\_ Verified by: \_\_\_

All information provided to Broward County is subject to verification. Vendor agrees to a final inspection, reversion of the award, or termination of the contract.

**Supplier: DPR**

**LITIGATION HISTORY FORM**

The completed form(s) should be returned with the Vendor's submittal. If not provided with submittal, the Vendor must submit within three business days of County's request. Vendor may be deemed non-responsive for failure to fully comply within stated timeframes.

- There are no material cases for this Vendor; or
- Material Case(s) are disclosed below:

Is this for a: (check type) <input type="checkbox"/> Parent, <input type="checkbox"/> Subsidiary, or <input type="checkbox"/> Predecessor Firm?	If Yes, name of Parent/Subsidiary/Predecessor:  Or No <input type="checkbox"/>
Party	
Case Number, Name, and Date Filed	<b>CGC-19-577544, Mission Bay Block 23A Neurosciences Research Building, 07/11/2019 - Other cases are provided in attached document</b>
Name of Court or other tribunal	<b>Superior Court of the State of California, SF</b>
Type of Case	Bankruptcy <input type="checkbox"/> Civil <input type="checkbox"/> Criminal <input type="checkbox"/> Administrative/Regulatory <input type="checkbox"/>
Claim or Cause of Action and Brief description of each Count	<b>Payment, Violation of Cal. Pub. Contract Code, Violation of Statutory Duties, Libel, Declaratory Relief</b>
Brief description of the Subject Matter and Project Involved	<b>Plaintiff alleged non-payment in the amount of \$ 4,000,000., for services rendered. Violation of CA Public Contracts Code 10262, and Business and Professions Code Section 7108.5. Violation of the Subletting and Subcontracting Fair Practices Act, Section 4100, for which plaintiff seeks to recover \$ 5,700,000. Libel, for which plaintiff seeks punitive damages. Declaratory relief relative to each parties respective rights and duties with respect to the Subcontract.</b>
Disposition of Case  (Attach copy of any applicable Judgment, Settlement Agreement and Satisfaction of Judgment.)	Pending <input type="checkbox"/> Settled <input type="checkbox"/> Dismissed <input type="checkbox"/>  Judgment Vendor's Favor <input type="checkbox"/> Judgment Against Vendor <input type="checkbox"/>  If Judgment Against, is Judgment Satisfied? <input type="checkbox"/> Yes <input type="checkbox"/> No
Opposing Counsel	Name: <b>The Regents of The University of California, SF</b> Email: <b>regentsoffice@ucop.edu</b> Telephone Number:

**Vendor Name: DPR Construction**

BUSINESS

# Is one of Tampa Bay's premier condo towers sinking?



Tampa's Plaza Harbour Island condo tower, center, whose association is suing over alleged construction defects. LUIS SANTANA | Times&#13;

By **Susan Taylor Martin**

Published Nov. 17, 2016

TAMPA

It has been called Tampa's "most prestigious building" and "the most refined expression of living" in all of Tampa Bay. The views are "stunning," the amenities

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But is the Plaza Harbour Island sinking?

The Plaza condo association is embroiled in a lawsuit alleging that the 20-story, 144-unit tower built in 2007 is plagued with problems. Among them: exterior cracking that is the result of "significant subsidence concerns and structural design deficiencies."

Geotechnical investigations found "very loose and very soft bay bottom soils" under the first-floor commercial units, according to the suit filed in Hillsborough County Circuit Court. "These soils are completely unsuitable to support the foundation and, as a result, the soils have settled with resulting movement and significant cracking of the walls, stucco and structure."

Now, in a tower where some units once sold for more than \$2 million, damages caused by the alleged defects have included "loss of use, relocation expenses, diminution in value, increased insurance premiums (and) damage to other property," the suit states.

The Plaza's problems emerge as the condo association of Tampa Bay's tallest condo tower, the 36-story, 244-unit Signature Place in downtown St. Petersburg, purportedly has reached a settlement in a lawsuit alleging major construction defects there. Both the Plaza and Signature Place were built in the mid 2000s just as the housing boom was going bust.

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contained a phosphate terminal. Sold to a developer in 1979, the island has since been transformed into a largely residential community where the Plaza at 450 Knights Run Ave. has reigned as the premier condo tower.

Records show that concerns about soil subsidence go back at least two years. In November 2014, a Lakeland company was hired to do "foundation stabilization" on Unit 707 in the townhouse portion of the Plaza.

Just as that work was finished the following spring, a Tampa law firm representing the condo association sent a letter to the contractors and others putting them on notice of "certain design and construction defects."

In addition to the foundation and cracking issues, the letter said, there were problems with the installation of aluminum railings and an inadequate drainage system that caused water to damage planter beds and part of the building.

The defects remained undiscovered for some time after the building was completed — either because they were "latent" or not easily recognized by people "who lack special knowledge or training," according to the lawsuit subsequently filed by the association.

Gail Bernucca, a Realtor and the association's president, said she could not comment because of the suit. DPR Construction and Hardin Construction, which share a Tampa office address, did not return calls.

Since the problems were found, Plaza owners have been required to "disclose the existence of these conditions to any potential purchaser, thereby limiting the marketability of his/her unit and reduce the fair market value of the unit," the lawsuit says.

Multiple Listing records show that sales in the Plaza have slowed, though it is difficult to determine how much prices have been affected.

So far this year, seven units have sold. The top price paid was \$885,000 — down \$74,000 from the asking price — for a two-bedroom, two-bath unit in September.

Another striking difference: More than half of the buyers last year got mortgage loans. This year, all sales have been in cash.

"Therein lies the issue — getting financing when there's a pending lawsuit," said Jeremiah Bicknese, an agent with Smith & Associates. "There are a few banks that just don't want to flex on that."

Bicknese said he has told Plaza sellers that he represents to "over-disclose" issues with the building in order to avoid future problems with buyers.

"There's definitely an impact" he said of the defects and litigation, "but fortunately with my clients (the buyers) were able to pay cash."

Seven Plaza units currently are for sale, including the penthouse with an asking price of nearly \$2.4 million. It has been on the market for well over a year.

All houses and other buildings eventually settle into their foundations, construction experts say, and most pose little real danger to occupants. But San Francisco's 58-story Millennium Tower, built about the same time as the Plaza, has sunk 16 inches and tilted at least 2 inches, prompting a class-action lawsuit and fears it could topple in an earthquake

This week, there were no signs from the street of any repairs that might be under way at the Plaza, unlike at Signature Place in St. Petersburg. There, scaffolding still covers part of the building two years after the condo association sued over multiple defects, including improperly installed stucco that could fly off in high winds.

Board members could not be reached for comment, but one Signature Place owner, Scott Brandi, said he had been told the suit had been settled. He hopes

It could not be determined whether Plaza owners will also face special assessments. Bicknese, who continues to show listings there, said regular association fees are comparable to those in other Tampa condo towers and that the Plaza remains a sought-after residence.

"It's such a lovely building that once people get the scope of it, even as buyers they are not as nervous," he said. "The amenities are amazing — there's valet service and 24-hour concierge service — and it's basically like living in a five-star hotel, like living in a Ritz-Carlton."

*Contact Susan Taylor Martin at [smartin@tampabay.com](mailto:smartin@tampabay.com) or (727) 893-8642. Follow @susanskate*

**CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

Case Number: 15-CA-011176  
 Uniform Case Number: 292015CA011176A001HC  
 Filed On: 2015-12-11  
 Case Type: Construction Defect  
 Case Status: Close of ReOpen  
 Judicial Officer: Thomas, K. Cheryl  
 Defendant: Harbour Phase I Owners LLC  
 Amount Due: \$0.00

**CASE PARTY INFORMATION**

Party Type	Name	Attorney	Attorney Contact
Defendant	Architectural Railings & Grilles Inc	CARTAYA , RINALDO J., III	407-872-6011
Defendant	Architectural Railings & Grilles Inc	VALASHINAS , KIMBERLY MURPHY	954-838-8832
Defendant	Architectural Railings & Grilles Inc	WALL , DOUGLAS IVAN	407-872-6011
Defendant	Architectural Railings & Grilles Inc	JOHNSON , ROBERT NATHAN	407-872-6011
Defendant	DeSimone Consulting Engineers LLC	KRESS, DOUGLAS JAMES	561-694-0070
Defendant	DPR Construction Inc	HICKMAN , JAMES KEITH	813-281-1900
Defendant	Harbour Phase I Owners LLC	HERMAN , ADAM CRAIG	407-420-4382
Defendant	Hardin Construction Company LLC	ANDERSON , DENISE M.	813-281-1900
Defendant	Hardin Construction Company LLC	HICKMAN , JAMES KEITH	813-281-1900
Defendant	Nichols Brosch Wurst Wolfe & Associates Inc	HUSTON-MILLER, PERI ROSE	954-526-5480
Defendant	Nichols Brosch Wurst Wolfe & Associates Inc	ZIMMARO , ELIZABETH E.	561-684-3222
Defendant	Nichols Brosch Wurst Wolfe & Associates Inc	VERTES , WILLIAM W	561-684-3222
Defendant	O'Donnell, William R	KRESS, DOUGLAS JAMES	561-694-0070
Defendant	Patrinely Group LLC		
Plaintiff	Plaza Harbour Island Condominium Association Inc	QUINTERO , JASON JUDE	813-229-4103
Plaintiff	Plaza Harbour Island Condominium Association Inc	PRATS , LUIS	813-229-4102

**CASE JUDGE INFORMATION**

Judge Assigned	Division	Date	Reason
Thomas, K. Cheryl	Division A	12/11/2015	

**CASE EVENT INFORMATION**

Event Date	Doc Index	Charge Number	Title
10/03/2019	108		FINAL DISPOSITION FORM "Plaintiff: Plaza Harbour Island Condominium Association Inc"
08/29/2019	107		ORDER OF DISMISSAL Instrument Number: 2019380123 Instrument Number: 2019462419
08/28/2019	105		AMENDED NOTICE "Plaintiff: Plaza Harbour Island Condominium Association Inc"
08/28/2019	104		NOTICE OF VOLUNTARY DISMISSAL Instrument Number: 2019376777 "Plaintiff: Plaza Harbour Island Condominium Association Inc" Instrument Number: 2019303454 "Plaintiff: Plaza Harbour Island Condominium Association Inc"
06/17/2019	100		NOTICE OF CERTIFICATION OF AUTHORITY

 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

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06/14/2019	99	NOTICE OF CANCELLATION "Plaintiff: Plaza Harbour Island Condominium Association Inc" "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc" "Plaintiff: Plaza Harbour Island Condominium Association Inc"
06/05/2019	97	MOTION FOR LEAVE TO PLT UNOPPOSED - FILE AMENDED WITNESS DISCLOSURE "Plaintiff: Plaza Harbour Island Condominium Association Inc"
06/05/2019	96	AGREED ORDER GRANTING PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED WITNESS DISCLOSURE "Defendant: Architectural Railings & Grilles Inc", "Defendant: DeSimone Consulting Engineers LLC", "Defendant: DPR Construction Inc", "Defendant: Harbour Phase I Owners LLC", "Defendant: Hardin Construction Company LLC", "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Defendant: O'Donnell, William R", "Defendant: Patrinely Group LLC", "Plaintiff: Plaza Harbour Island Condominium Association Inc", "Private Attorney: ANDERSON, DENISE M.", "Private Attorney: HERMAN, ADAM CRAIG", "Private Attorney: HICKMAN, JAMES KEITH", "Private Attorney: HOUSTON-MILLER, PERI ROSE", "Private Attorney: KRESS, DOUGLAS JAMES", "Private Attorney: PRATS, LUIS", "Private Attorney: WALL, DOUGLAS IVAN", "Date Signed: 06/05/2019", "Judicial Officer:: Thomas, Cheryl K"
06/04/2019	95	MOTION FOR PARTIAL JUDGMENT AND MEMORANDUM OF LAW
06/03/2019	94	REQUEST FOR COPIES "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
06/03/2019	93	NOTICE OF CONFLICT "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
06/03/2019	92	NOTICE OF CANCELLATION "Plaintiff: Plaza Harbour Island Condominium Association Inc"
05/31/2019	91	REQUEST FOR COPIES "Defendant: DeSimone Consulting Engineers LLC", "Defendant: O'Donnell, William R", "Private Attorney: KRESS, DOUGLAS JAMES"
05/29/2019	90	AMENDED NOTICE OF TAKING DEPOSITION "Plaintiff: Plaza Harbour Island Condominium Association Inc"
05/26/2019	89	NOTICE OF TAKING DEPOSITION "Plaintiff: Plaza Harbour Island Condominium Association Inc"
05/20/2019	88	NOTICE OF INTENT TO SUBPOENA "Plaintiff: Plaza Harbour Island Condominium Association Inc"
05/15/2019	87	REQUEST FOR PRODUCTION "Defendant: DeSimone Consulting Engineers LLC"
05/15/2019	86	NOTICE OF ANSWERS TO INTERROGATORIES "Defendant: DeSimone Consulting Engineers LLC"
05/14/2019	85	AMENDED NOTICE OF TAKING DEPOSITION "Defendant: DeSimone Consulting Engineers LLC" "Plaintiff: Plaza Harbour Island Condominium Association Inc"
05/07/2019	83	NOTICE OF CANCELLATION OF DEPOSITION **DUCES TECUM ** ARNOLD GRODOTZ "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/30/2019	82	NOTICE OF TAKING VIDEO DEPOSITION "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/30/2019	81	AMENDED NOTICE OF TAKING DEPOSITION "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."

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 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

04/29/2019	80	NOTICE OF TAKING DEPOSITION WITH SUBPOENAS ATTACHED TODD SHANNON "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
04/26/2019	79	AMENDED NOTICE OF TAKING DEPOSITION "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/25/2019	78	NOTICE OF TAKING DEPOSITION "Defendant: DeSimone Consulting Engineers LLC"
04/25/2019	77	AMENDED NOTICE OF TAKING DEPOSITION "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/23/2019	76	NOTICE OF TAKING VIDEO DEPOSITION **DUCES TECUM** - ELIZABETH BAILEY "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/23/2019	75	AMENDED NOTICE OF TAKING VIDEO DEPOSITION **DUCES TECUM** - SHAWN FERRIS "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/23/2019	74	AMENDED NOTICE OF TAKING VIDEO DEPOSITION **DUCES TECUM** - ANDREW BLACK "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/23/2019	73	AMENDED NOTICE OF TAKING DEPOSITION THIRD - OF CONTINUATION OF STEVE MAINARDI "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/23/2019	72	AMENDED NOTICE OF TAKING DEPOSITION SECOND - OF WILLIAM C. CHARVAT "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/23/2019	71	NOTICE OF MEDIATION CONFERENCE "Plaintiff: Plaza Harbour Island Condominium Association Inc"
04/18/2019	70	WITNESS LIST "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
04/18/2019	69	AMENDED NOTICE "Plaintiff: Plaza Harbour Island Condominium Association Inc"
04/18/2019	68	WITNESS LIST "Defendant: DeSimone Consulting Engineers LLC"
04/17/2019	67	NOTICE OF TAKING VIDEO DEPOSITION "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
04/17/2019	66	AMENDED NOTICE OF TAKING DEPOSITION "Plaintiff: Plaza Harbour Island Condominium Association Inc" "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W." "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc", "Private Attorney: VERTES, WILLIAM W."
04/15/2019	63	NOTICE OF TAKING VIDEO DEPOSITION WITH SUBPOENA; TO: ANDREW BLACK "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
04/10/2019	62	AMENDED NOTICE OF TAKING DEPOSITION "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc" "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc" "Plaintiff: Plaza Harbour Island Condominium Association Inc"
04/05/2019	59	NOTICE OF TAKING DEPOSITION

**CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

"Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"  
"Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"  
"Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"  
"Plaintiff: Plaza Harbour Island Condominium Association Inc"  
"Plaintiff: Plaza Harbour Island Condominium Association Inc"

03/21/2019 54 AMENDED ORDER  
SETTING CASE FOR TRIAL AND PRETRIAL (JURY TRIAL) (Amended as to time only)  
"Defendant: Architectural Railings & Grilles Inc","Defendant: DeSimone Consulting Engineers LLC","Defendant: DPR Construction Inc","Defendant: Harbour Phase I Owners LLC","Defendant: Hardin Construction Company LLC","Defendant: Nichols Brosch Wurst Wolfe & Associates Inc","Defendant: O'Donnell, William R","Defendant: Patrinely Group LLC","Plaintiff: Plaza Harbour Island Condominium Association Inc","Private Attorney: ANDERSON, DENISE M.,"Private Attorney: HERMAN, ADAM CRAIG","Private Attorney: HICKMAN, JAMES KEITH","Private Attorney: HOUSTON-MILLER, PERI ROSE","Private Attorney: KRESS, DOUGLAS JAMES","Private Attorney: PRATS , LUIS","Private Attorney: WALL, DOUGLAS IVAN","Date Signed: 03/21/2019","Judicial Officer:: Thomas, Cheryl K"

03/19/2019 53 WITNESS LIST  
"Plaintiff: Plaza Harbour Island Condominium Association Inc"

03/14/2019 52 ORDER SETTING PRETRIAL AND JURY TRIAL  
PRETRIAL ON JULY 17, 2019 AT 9:00 AM -- JURY TRIAL DURING THE WEEK OF AUGUST 5, 2019 AT 9:00 AM  
"Defendant: Architectural Railings & Grilles Inc","Defendant: DeSimone Consulting Engineers LLC","Defendant: DPR Construction Inc","Defendant: Harbour Phase I Owners LLC","Defendant: Hardin Construction Company LLC","Defendant: Nichols Brosch Wurst Wolfe & Associates Inc","Defendant: O'Donnell, William R","Defendant: Patrinely Group LLC","Plaintiff: Plaza Harbour Island Condominium Association Inc","Private Attorney: ANDERSON, DENISE M.,"Private Attorney: HERMAN, ADAM CRAIG","Private Attorney: HICKMAN, JAMES KEITH","Private Attorney: HOUSTON-MILLER, PERI ROSE","Private Attorney: KRESS, DOUGLAS JAMES","Private Attorney: PRATS , LUIS","Private Attorney: WALL, DOUGLAS IVAN","Date Signed: 03/14/2019","Judicial Officer:: Thomas, Cheryl K"

03/13/2019 51 NOT OF SERVICE OF INTERROGATORIES  
"Plaintiff: Plaza Harbour Island Condominium Association Inc"  
"Plaintiff: Plaza Harbour Island Condominium Association Inc"

03/06/2019 49 ORDER ON  
STIPULATED - MOTION FOR CONTINUANCE - GRANTED - THE PARTIES SHALL MEDIATE THIS MATTER ON OR BEFORE JUNE 31, 2019, THIS CASE IS SET FOR TRIAL FOR THE TWO WEEK TRIAL PERIOD BEGINNING AUGUST 5, 2019 THROUGH AUGUST 16, 2019, PRETRIAL IS SET FOR JULY 17,  
"Defendant: Architectural Railings & Grilles Inc","Defendant: DeSimone Consulting Engineers LLC","Defendant: DPR Construction Inc","Defendant: Harbour Phase I Owners LLC","Defendant: Hardin Construction Company LLC","Defendant: Nichols Brosch Wurst Wolfe & Associates Inc","Defendant: O'Donnell, William R","Defendant: Patrinely Group LLC","Plaintiff: Plaza Harbour Island Condominium Association Inc","Private Attorney: ANDERSON, DENISE M.,"Private Attorney: HERMAN, ADAM CRAIG","Private Attorney: HICKMAN, JAMES KEITH","Private Attorney: HOUSTON-MILLER, PERI ROSE","Private Attorney: KRESS, DOUGLAS JAMES","Private Attorney: PRATS , LUIS","Private Attorney: WALL, DOUGLAS IVAN"

02/13/2019 48 JOINT MOTION  
FOR CONTINUANCE OF TRIAL  
"Defendant: DeSimone Consulting Engineers LLC","Defendant: O'Donnell, William R"

02/12/2019 47 NOTICE OF TAKING DEPOSITION  
"Defendant: DeSimone Consulting Engineers LLC","Defendant: O'Donnell, William R","Private Attorney: KRESS, DOUGLAS JAMES"

02/06/2019 46 NOTICE OF NON-AVAILABILITY  
WILLIAM W. VERTES

**CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

		"Private Attorney: VERTES, WILLIAM W."
12/20/2018	45	NOTICE "Private Attorney: VERTES, WILLIAM W."
12/05/2018	44	AMENDED NOTICE OF TAKING DEPOSITION "Plaintiff: Plaza Harbour Island Condominium Association Inc"
11/01/2018	43	NOTICE OF TAKING VIDEO DEPOSITION THE PLAINTIFF'S CORP. REP., PURSUANT TO FLA. R. CIV. P. 1.310(B)(6), WHO WILL PROVIDE BINDING TESTIMONY "Defendant: DeSimone Consulting Engineers LLC"
10/31/2018	42	NOTICE OF APPEARANCE SECOND AMENDED - AND DESIGNATION OF EMAIL ADDRESSES - WILLIAM W. VERTES, ESQ. "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
10/12/2018	41	NOTICE OF TAKING DEPOSITION CORPORATE REPRESENTATIVE OF NICHOLS BROSCH WURST WOLFE & ASSOCIATES, INC. "Plaintiff: Plaza Harbour Island Condominium Association Inc"
09/28/2018	40	NOTICE OF SERVICE OF PROPOSAL SETTLEMENT TO PLT "Defendant: DeSimone Consulting Engineers LLC"
09/24/2018	39	AMENDED NOTICE OF APPEARANCE NICHOLS BROSCH WURST WOLFE & ASSOCIATES, INC. S - AND DESIGNATION OF EMAIL ADDRESSES - WILLIAM W. VERTES, ESQ. "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
08/23/2018	37	STIPULATED ORDER SETTING MEDIATION DEADLINE & TRIAL DATE / MEDIATE THIS MATTER ON OR BEFORE February 28, 2019 / JT FOR THE 2 WEEK TRIAL PERIOD BEGINNING ON MAY 6, THROUGH MAY 17, 2019 -- 08/23/18 CKT "Date Signed: 08/23/2018", "Judicial Officer:: Thomas, Cheryl K"
08/22/2018	38	NOTICE OF APPEARANCE JASON J QUINTERO "Plaintiff: Plaza Harbour Island Condominium Association Inc"
08/10/2018	36	NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES PLTFF'S - UNVERIFIED SUPPLEMENTAL - DFDT'S CONTENTION "Plaintiff: Plaza Harbour Island Condominium Association Inc"
07/23/2018	34	AGREED ORDER AGREED ORDER ON NICHOLS BROSCH WURST WOLFE & ASSOCIATES, INC.'S MOTION TO COMPEL VERIFIED BETTER ANSWERS TO CONTENTION INTERROGATORIES AND ANSWERS AND/OR PRODUCTION OF SETTLEMENT INTERROGATORIES FROM PLAINTIFF; GRANTED; JUDGE C.K.THOMAS 07/23/2018 "Date Signed: 07/23/2018", "Judicial Officer:: Thomas, Cheryl K"
07/23/2018	33	ORDER CONFIDENTIALITY AND PROTECTIVE ORDER 07/23/18 CKT "Plaintiff: Plaza Harbour Island Condominium Association Inc", "Date 2: 07/23/2018", "Judicial Officer:: Thomas, Cheryl K"
07/20/2018	35	JOINT STIPULATION FOR ENTRY OF CONFIDENTIALITY ORDER "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
07/18/2018	32	AMENDED NOTICE OF APPEARANCE NICHOLS BROSCH WURST WOLFE & ASSOCIATES - AND DESIGNATION OF EMAIL ADDRESSES; JON D. DERREVERE, ESQ.; ELIZABETH E. ZIMMARO, ESQ. "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
07/13/2018	31	NOTICE OF CANCELLING HEARING

**CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

NICHOLS BROSCH WURST WOLFE & ASSOCIATES, INC. S MOTION TO COMPEL BETTER ANSWERS AND/OR PRODUCTION OF SETTLEMENT INTERROGATORIES TO PLAINTIFF; NICHOLS BROSCH WURST WOLFE & ASSOCIATES, INC. S MOTION...

"Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"

07/13/2018 30 NOTICE OF CANCELLING HEARING

CROSS NOTICED; PLT NOTICE THAT ACTION IS AT ISSUE AND READY TO BE SET FOR JURY TRIAL

"Plaintiff: Plaza Harbour Island Condominium Association Inc"

07/12/2018 29 ORDER GRANTING MOTION TO - FOR

ORDER GRANTING DEFENDANTS, DESIMONE CONSULTING ENGINEERS, LLC AND WILLIAM R. O'DONNELL, P.E.'S MOTION FOR TELEPHONIC APPEARANCE;

ORDERED AND ADJUDGED that Defendants, DESIMONE CONSULTING ENGINEERS, LLC and WILLIAM R. O'DONNELL, P.E.'s Motion for Tele

"Date Signed: 07/12/2018", "Judicial Officer:: Thomas, Cheryl K"

07/12/2018 28 MOTION TO - FOR

DEFENDANTS, DESIMONE CONSULTING AND WILLIAM R. O DONNELL, P.E. S - TELEPHONIC APPEARANCE

"Defendant: DeSimone Consulting Engineers LLC", "Defendant: O'Donnell, William R"

07/10/2018 27 ORDER GRANTING

J. DEREK KANTASKAS' MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF - \*\*GRANTED\*\* -- 07/10/18 CKT

"Plaintiff: Plaza Harbour Island Condominium Association Inc", "Date Signed: 07/10/2018", "Judicial Officer:: Thomas, Cheryl K"

06/26/2018 26 MOTION TO WITHDRAW

AS COUNSEL FOR PLAINTIFF

"Plaintiff: Plaza Harbour Island Condominium Association Inc", "Private Attorney: KANTASKAS , J DEREK"

06/14/2018 25 CROSS NOTICE OF HEARING

on Monday, July 16, 2018, at 9:30 a.m.,

"Plaintiff: Plaza Harbour Island Condominium Association Inc"

06/14/2018 24 NOTICE OF HEARING

RE- ; NICHOLS BROSCH MOTION TO COMPEL BETTER ANSWERS AND/OR PRODUCTION OF SETTLEMENT INTERROGS TO PLT; NICHOLS BROSCH MOTION TO COMPEL VERIFIED BETTER ANSWERS TO CONTENTION INTERROGS FROM PLT

"Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"

05/02/2018 23 CROSS NOTICE OF HEARING

\*\*AMENDED\*\* (AS TO DATE ONLY) - SET FOR JUNE 28, 2018 AT 9:30 AM

05/02/2018 22 CROSS NOTICE OF HEARING

ON 06/28/18 AT 9:30 AM

04/06/2018 21 CERTIFICATE OF NON-OBJECTION

04/02/2018 20 NOTICE OF HEARING

DFDT'S MOTION TO COMPEL BETTER ANSWERS AND/OR PRODUCTION OF SETTLEMENT INTERROGATORIES TO PLAINTIFF; DFDT'S MOTION TO COMPEL VERIFIED BETTER ANSWERS TO...

03/27/2018 19 NOTICE OF CANCELLING HEARING

DFDT'S MOTION TO COMPEL BETTER ANSWERS AND/OR PRODUCTION OF SETTLEMENT INTERROGATORIES TO PLAINTIFF; DFDT'S MOTION TO COMPEL VERIFIED BETTER ANSWERS TO...

03/23/2018 18 NOTICE OF PRODUCTION FROM NON PARTY SUBPOENA ATTACHED

DEF NICHOLS BROSCH WURST; 4X, SUB ATTACHED, COS 3/23/18

03/22/2018 17 NOTICE OF HEARING

03/12/2018 16 MOTION TO COMPEL

VERIFIED BETTER ANSWERS TO CONTENTION INTERROGATORIES

"Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"

 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

02/27/2018	15	MOTION TO COMPEL BETTER ANSWERS AND/OR PRODUCTION OF SETTLEMENT INTERROGS TO PLT "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
02/09/2018	14	NOTICE OF ANSWERS TO INTERROGATORIES PLT - DEF NICHOLS WOLFES SETTLEMENT INTERROGS
02/09/2018	13	RESPONSE TO REQUEST FOR PRODUCTION PLT - DEF NICHOLS WOLFE & ASSOCIATES SETTLEMENT
02/06/2018	12	AMENDED NOTICE OF APPEARANCE "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
01/30/2018	11	RESPONSE TO REQUEST FOR PRODUCTION
01/30/2018	10	NOTICE OF SERVICE OF INTERROGATORIES
01/23/2018	9	NOTICE OF TAKING DEPOSITION
01/19/2018	8	NOTICE OF NON-AVAILABILITY PERI ROSE HUSTON-MILLER, ESQ., 4/2/18-4/6/18
01/03/2018	7	REQUEST TO PRODUCE SETTLEMENT
01/03/2018	6	NOTICE OF SERVICE OF INTERROGATORIES SETTLEMENT
12/26/2017	5	NOTICE OF VOLUNTARY DISMISSAL Instrument Number: 2018004667
12/26/2017	4	NOTICE THAT CAUSE IS AT ISSUE AND READY TO BE SET FOR JURY TRIAL
12/26/2017	3	NOTICE OF VOLUNTARY DISMISSAL PARTIAL
12/14/2017	2	REQUEST TO PRODUCE FIRST
12/14/2017	1	NOTICE OF SERVICE OF INTERROGATORIES CONTENTION
06/19/2017		RESPONSE TO REQUEST FOR PRODUCTION
06/19/2017		NOTICE OF SERVICE OF INTERROGATORIES
04/25/2017		REQUEST FOR COPIES DFDTS
04/04/2017		DESIGNATION OF EMAIL ADDRESS AMENDED
04/03/2017		REQUEST FOR COPIES
03/24/2017		REQUEST FOR PRODUCTION
03/24/2017		NOT OF SERVICE OF INTERROGATORIES
03/21/2017		DESIGNATION OF EMAIL ADDRESS
02/24/2017		NOTICE OF COMPLIANCE (DEFENDANT S, HARDIN CONSTRUCTION COMPANY, LLC,)
02/24/2017		NOTICE OF COMPLIANCE (DEFENDANT S, HARDIN CONSTRUCTION COMPANY, LLC,)
02/24/2017		NOTICE OF COMPLIANCE (DEFENDANT S, HARDIN CONSTRUCTION COMPANY, LLC,)
02/24/2017		NOTICE OF COMPLIANCE (DEFENDANT S, HARDIN CONSTRUCTION COMPANY, LLC,)
02/23/2017		REQUEST FOR COPIES TO DEFENDANT, HARDIN CONSTRUCTION COMPANY, LLC TO DEFENDANT, HARDIN CONSTRUCTION COMPANY, LLC TO DEFENDANT, HARDIN CONSTRUCTION COMPANY, LLC
01/24/2017		NOTICE OF PRODUCTION FROM NON PARTY SUBPOENA ATTACHED

 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

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12/29/2016	PRIVILEGE LOG
12/16/2016	NOTICE OF CHANGE OF FIRM NAME
11/16/2016	NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES
11/02/2016	NOTICE OF NON-AVAILABILITY
10/04/2016	NOTICE OF APPEARANCE KIMBERLY M VALASHINAS, ESQ. "Defendant: Architectural Railings & Grilles Inc"
10/03/2016	RESPONSE TO REQUEST FOR PRODUCTION PLAINTIFF, THE PLAZA HARBOUR ISLAND CONDOMINIUM ASSOCIATION, INC. S RESPONSE TO DEFENDANTS, DESIMONE CONSULTING ENGINEERS, LLC S, AND WILLIAM R. O DONNELL S REQUEST FOR PRODUCTION
10/03/2016	NOTICE OF ANSWERS TO INTERROGATORIES PLAINTIFF, THE PLAZA HARBOUR ISLAND CONDOMINIUM ASSOCIATION, INC. S NOTICE OF SERVING UNVERIFIED ANSWERS TO DEFENDANTS, DESIMONE CONSULTING ENGINEERS, LLC S, AND WILLIAM R. O DONNELL S FIRST SET OF IN
09/28/2016	NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES
08/29/2016	PRIVILEGE LOG
08/29/2016	RESPONSE TO REQUEST TO PRODUCE DEFENDANT'S, NICHOLS BROSCHE WURST WOLFE & ASSOCIATES, INC., SUPPLEMENTAL RESPONSE TO PLAINTIFF'S, FIRST REQUEST
08/08/2016	REQUEST FOR COPIES
08/08/2016	REQUEST FOR PRODUCTION
08/08/2016	NOTICE OF SERVICE OF INTERROGATORIES
07/20/2016	REQUEST FOR COPIES
07/08/2016	NOTICE OF SERVICE OF RESPONSE TO REQUEST TO PRODUCE NOTICE OF SERVING DEFENDANT, ARCHITECTURAL RAILINGS & GRILLES, INC. S RESPONSES TO PLAINTIFF S REQUEST FOR PRODUCTION
07/08/2016	NOTICE OF SERVICE OF INTERROGATORIES NOTICE OF SERVING DEFENDANT, ARCHITECTURAL RAILINGS & GRILLES, INC. S UNVERIFIED RESPONSES TO PLAINTIFF S FIRST SET OF INTERROGATORIES
07/07/2016	REQUEST FOR COPIES
07/01/2016	MOTION FOR EXTENSION OF TIME (UNOPPOSED) TO RESPOND TO PLAINTIFF'S FIRST SET OF DISCOVERY "Defendant: Harbour Phase I Owners LLC"
06/30/2016	REQUEST FOR COPIES
06/30/2016	ANSWER TO INTERROGATORIES
06/30/2016	RESPONSE TO REQUEST TO PRODUCE
06/30/2016	RESPONSE TO REQUEST FOR PRODUCTION
06/27/2016	RESPONSE TO REQUEST TO PRODUCE & OBJECTIONS
06/27/2016	NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES UNVERIFIED
06/27/2016	RESPONSE TO REQUEST FOR PRODUCTION & OBJECTIONS
06/27/2016	NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES UNVERIFIED
06/24/2016	NOTICE OF SERVICE OF INTERROGATORIES DEFENDANT HARDIN CONSTRUCTION COMPANY, LLC S NOTICE OF SERVING OBJECTIONS AND ANSWERS TO PLAINTIFF S FIRST SET OF INTERROGATORIES
06/24/2016	RESPONSE TO REQUEST FOR PRODUCTION

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 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

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DEFENDANT HARDIN CONSTRUCTION COMPANY, LLC'S RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

05/27/2016 MOTION TO DISMISS  
PLTF'S 1ST AMENDED COMPLAINT & INCORPORATED MEMORANDUM OF LAW  
"Defendant: Harbour Phase I Owners LLC"

05/27/2016 NOTICE OF APPEARANCE  
& EMAIL DESIGNATION - ADAM C HERMAN  
"Defendant: Harbour Phase I Owners LLC"

05/25/2016 ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFFS FIRST AMENDED COMPLAINT  
"Defendant: Architectural Railings & Grilles Inc"

05/20/2016 NOTICE OF VOLUNTARY DISMISSAL  
Instrument Number: 2016203819

05/19/2016 DESIGNATION OF EMAIL ADDRESS  
NOTICE OF DESIGNATION OF EMAIL ADDRESSES PURSUANT TO FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.516

05/19/2016 NOTICE OF APPEARANCE  
OF DOUGLAS WALL, ESQ - RINALDO J CARTAYA III., ESQ AND ROBERT JOHNSON, ESQ AS COUNSEL  
"Defendant: Architectural Railings & Grilles Inc"

05/10/2016 REQUEST FOR PRODUCTION  
TO WILLIAM R. O DONNELL, P.E.

05/10/2016 REQUEST FOR PRODUCTION  
TO PATRINELY GROUP, LLC

05/10/2016 REQUEST FOR PRODUCTION  
TO NICHOLS BROSC WURST WOLFE & ASSOCIATES, INC.

05/10/2016 REQUEST FOR PRODUCTION  
TO HARDIN CONSTRUCTION COMPANY, LLC

05/10/2016 REQUEST FOR PRODUCTION  
TO HARBOUR PHASE 1, OWNERS, LLC

05/10/2016 REQUEST FOR PRODUCTION  
TO DPR CONSTRUCTION, INC.

05/10/2016 REQUEST FOR PRODUCTION  
TO DESIMONE CONSULTING ENGINEERS, LLC

05/10/2016 REQUEST FOR PRODUCTION  
TO ARCHITECTURAL RAILINGS & GRILLES, INC.

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO WILLIAM R. O DONNELL, P.E.

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO PATRINELY GROUP, LLC.

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO NICHOLS BROSC WURST WOLFE & ASSOCIATES, INC.

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO HARDIN CONSTRUCTION COMPANY, LLC

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO HARBOUR PHASE I OWNERS, LLC

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO DPR CONSTRUCTION, INC.

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO DESIMONE CONSULTING ENGINEERS, LLC.

05/10/2016 NOTICE OF SERVICE OF INTERROGATORIES  
1ST SET TO ARCHITECTURAL RAILINGS & GRILLES, INC.

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 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

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05/09/2016	ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST AMENDED COMPLAINT "Defendant: DeSimone Consulting Engineers LLC", "Defendant: O'Donnell, William R"
05/06/2016	NOTICE OF FILING AFFIDAVIT OF ANDREW BLACK IN SUPPORT OF DPR CONSTRUCTION INC'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION
05/06/2016	MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT "Defendant: DPR Construction Inc"
05/06/2016	NOTICE OF SERVICE OF INTERROGATORIES
05/06/2016	REQUEST FOR PRODUCTION
04/29/2016	MOTION TO STRIKE PLAINTIFF'S CLAIMS FOR ATTORNEY'S FEES "Defendant: Hardin Construction Company LLC"
04/29/2016	MOTION TO DISMISS AMENDED COMPLAINT OR, IN THE ALTERNATIVE MOTION FOR MORE DEFINITE STATEMENT "Defendant: Hardin Construction Company LLC"
04/29/2016	NOTICE OF APPEARANCE AND E-MAIL DESIGNATIONS - DENISE M. ANDERSON, ESQ., AND JAMES K. HICKMAN, ESQ. "Defendant: Hardin Construction Company LLC"
04/28/2016	NOTICE OF FILING RETURNS OF SERVICE
04/27/2016	NOTICE OF APPEARANCE NOTICE OF APPEARANCE AND DESIGNATION OF EMAIL ADDRESSES - DOUGLAS J KRESS, ESQ "Defendant: DeSimone Consulting Engineers LLC", "Defendant: O'Donnell, William R"
04/18/2016	ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF S, PLAZA HARBOUR ISLAND CONDOMINIUM ASSOCIATION, INC., FIRST AMENDED COMPLAINT "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
04/18/2016	NOTICE OF APPEARANCE AND DESIGNATION OF EMAIL ADDRESSES - JON DERREVERE, ESQ. & PERI ROSE HUSTON-MILLER, ESQ. "Defendant: Nichols Brosch Wurst Wolfe & Associates Inc"
03/23/2016	E-FILED SUMMONS ISSUED X 8 lcoffey@carltonfields.com
03/18/2016	E-FILED REQUEST FOR SUMMONS TO BE ISSUED Filer has been notified that the required summons fee must be paid before it can be issued.
03/18/2016	E-FILED REQUEST FOR SUMMONS TO BE ISSUED Filer has been notified that the required summons fee must be paid before it can be issued.
03/18/2016	E-FILED REQUEST FOR SUMMONS TO BE ISSUED Filer has been notified that the required summons fee must be paid before it can be issued.
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03/18/2016	E-FILED REQUEST FOR SUMMONS TO BE ISSUED Filer has been notified that the required summons fee must be paid before it can be issued.
03/18/2016	REQUEST FOR SUMMONS TO BE ISSUED (E-Filed)

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 **CASE NUMBER: 15-CA-011176**

**Plaza Harbour Island Condominium Association Inc vs Harbour Phase I Owners LLC**

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	Filer has been notified that the required summons fee must be paid before it can be issued.
03/18/2016	REQUEST FOR SUMMONS TO BE ISSUED (E-Filed) Filer has been notified that the required summons fee must be paid before it can be issued.
03/18/2016	REQUEST FOR SUMMONS TO BE ISSUED (E-Filed) Filer has been notified that the required summons fee must be paid before it can be issued.
03/18/2016	AMENDED COMPLAINT FIRST AND DEMAND FOR JURY TRIAL / NO COS "Plaintiff: Plaza Harbour Island Condominium Association Inc"
12/11/2015	LETTER TO ATTORNEY REQUESTING FEES
12/11/2015	REQUEST FOR DIVISION ASSIGNMENT (E-FILING)
12/11/2015	COMPLAINT dkantaskas@cfjblaw.com ; lalcorn@cfjblaw.com ; tpaecf@cfdom.net
12/11/2015	CIVIL COVER SHEET
12/11/2015	FILE HOME LOCATION IS TAMPA

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