

Robin D. Franks, P.G., CHMM, RSO
Forensic Expert Witness & Litigation Support Experience

Robin Franks, President of TGE Resources Inc., provides Expert Witness and Litigation Consulting as a fact and expert witness in cases involving unique environmental hazards and alleged public risk, hazardous waste and discharges, environmental impact to real property, comprehensive site assessments, cost estimates for real property damage, long term corrective action, litigation support for defendants in pursuit of underwriter compensation, pending litigation, renders expert opinions specific to environmentally-related practices and has 25 years of relevant industry experience. TGE Resources, Inc. provides Environmental Management and Consulting services to the public sector, private sector and federal marketplace. References provided upon request.

Education

- Dual Bachelor of Science in Geology and Biology – Stephen F. Austin State University, 1982
- Master of Science in Geology – Stephen F. Austin State University, 1988

Professional Registrations

- State of Texas Professional Geoscientist – (PG #875)
- Professional Geologist – Mississippi (PG #0778)
- Professional Geologist – Tennessee (#TN3213)
- Institute of Hazardous Materials Management – Certified Hazardous Materials Manager, Master Level (CHMM #3725)
- Texas Commission on Environmental Quality – Corrective Action Project Manager (CAPM #642)
- Radiation Safety Officer and NORM Surveyor/Supervisor – NRC Compliant
- Texas Department of State Health Services – Mold Assessment Consultant (#MAC270)
- Texas Department of State Health Services – Licensed Lead Abatement Supervisor (#2080002)
- Texas Department of State Health Services – Licensed Individual Asbestos Consultant (#105379)
 - Texas Department of State Health Services – AHERA/EPA Accredited Asbestos Inspector
 - Texas Department of State Health Services – AHERA/EPA Accredited Asbestos Management Planner
 - Texas Department of State Health Services – AHERA/EPA Accredited Asbestos Designer
 - Texas Department of State Health Services – Asbestos Air Monitoring Technician
- Arkansas Department of Environmental Quality – Asbestos Certification Program (#015166)
 - Arkansas Department of Environmental Quality –Asbestos Inspector
 - Arkansas Department of Environmental Quality –Asbestos Management Planner
 - Arkansas Department of Environmental Quality – Asbestos Project Designer
- State of Florida – Mold Assessor (#MRSA1712)
- State of Ohio – Asbestos Hazard Abatement Project Designer
 - State of Ohio Department of Health – Division of Quality Assurance – Asbestos Program (#PD60805)

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Subject Categories

- Real Estate Assessments (Environmental Due Diligence)
- Environmental Compliance Audits
- Remediation Management & Corrective Action (Clean-up) Consulting of Contaminated Real Estate
- Risk-Based Closure
- Hazardous & Solid Waste Materials Management & Clean-up Consulting of Affected Property
- Asbestos, Lead-Based Paint, Mold/Fungal, & Industrial Hygiene
- Radiation Safety (NORM)
- Environmental Forensics Consulting, Litigation Support & Expert Testimony
- Petroleum Storage Tank (PST) Management, Compliance & Corrective Action
- Environmental Testing & Clean-up Consulting
- Industry-Specific Expertise
- General Consulting & Client Representation

Litigation Experience

BLT-Houston, LLC vs. Houston Motor Sports, Inc., David E. Lednicky and Charles R. Harvey (aka Bob Harvey) Cause No. 2010-78604; in the Judicial District Court of Harris County, Texas.

Real Property Location: Houston, Texas (2011 to 2012 – L)

Retained for litigation support (consultant) in this matter for environmental impact to real property formerly leased by Houston Motor Sports, Inc. Ms. Franks was retained by Houston Motor Sports, Inc. (defendant) to conduct a peer review of foregoing subsurface assessment information, attend a site inspection, conduct in-depth historical property use research, prepare an expert report and serve as a technical expert for litigation arising from alleged environmental contamination involving petroleum hydrocarbons. Cause successfully settled.

Becky Hendrix, et al., vs. Cajun Well Service and Mantle Oil and Gas, L.L.C. Case No. 032551; in the 23th Judicial District Court Parish of Assumption, Louisiana

Real Property Location: Paincourtville, Louisiana (September 2010 to present – L)

Ms. Franks was retained by Mantle Oil and Gas to conduct comprehensive site assessments and characterization following an on-shore well blowout. Conducted field assessment, emergency response, performed site sampling as necessary for chlorides, petroleum hydrocarbons and priority pollutants. Conferred with client, land owners and other experts at meetings with the LDEQ and DNR. Performed data reduction, prepared expert report, and prepared cost estimates for apparent real property damage. Retained by defendant to oversee long term corrective action and resource for pending litigation.

The Alta Fay and Eugene R. Fant Children's Trust of 1978 Number One v. John S. Beeson, Individually and as Trustee and Centerpoint Energy Houston Electric; LLC Cause No. 2010-29071; in the 269th Judicial District Court of Harris County, Texas

Real Property Location: Houston, Texas (2010 to 2012 – D, L, M/A)

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Initially retained as consultant for real property assessment and characterization for TRRP and IOP solicitation. Retained by plaintiff as technical expert and fact witness for COC trespass, remediation, cost estimation, consultant for pre-trial mediation and testimony. Testified during court hearings and challenges pre-trial. Later, testified during jury trial (multiple days) informal court proceedings.

Great American Insurance Company of New York vs. SMX 98, Inc., et al., Cause No. 4:09-cv-00603 pending in the United States District Court Southern District of Texas, Houston Division

Real Property Location: Houston, Texas (May 10, 2010 – D & L)

Retained fact and litigation support consultant/expert witness in this matter of environmental impact to real property (owned by third parties) occupied by Memorial Hermann Healthcare System (tenant). Retained (by the System) to conduct comprehensive site assessments following catastrophic loss to the location (in excess of 10 million dollars), preceding and following Hurricane Ike. Litigation arose related to an underwriting dispute; and due to alleged multiple builder defects. Provided opinion as to the cost and methods of repair, reconstruction and the magnitude of the loss.

Julie (Judy) Murray, Individually and as Successor-in-Interest to Erica Murray v. Chevron Corporation; Cause No. YC056221; in the Superior Court of California, County of Los Angeles

Real Property Location: Santa Maria Valley in Santa Barbara County, California; (October 20, 2009 – D & L)

Ms. Robin D. Franks was retained by plaintiff's counsel to render opinion specific to environmentally-related practices recorded and memorialized within certain documents provided by Client as related to exploration, production (E&P) and final removal of oil wells, sumps, wastes and ancillary structures during the time period 1965 to 1983 (inclusive) by Chevron and its predecessors. The scope of work performed involved researching and obtaining reasonably ascertainable historical documents with emphasis toward Operational and Abandonment phases of E&P property use within the subject lease area and designated time period. Cause successfully settled.

Stanley & Betty Pelletz, et al., vs. Weyerhaeuser Company & Advanced Environmental Recycling Technologies, Inc. Case Nos.: C08-0334JCC & C08-0403JCC; in the United States District Court for Western District (Class Action Settlement – 1/8/2009)

Real Property Location: Seattle, Washington; (October 2009 – L)

Provided litigation support for defendants in this case following Class Action Settlement in pursuit of underwriter compensation under a subsequent claim. Work related to evaluation of product for the possibility of pervasive/biological mold damage. Communicated to Client and prepared a testing protocol to evidence whether biological growth had resulted in damage. Inspected bulk samples and conferred with Client.

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New Mexico Environment Department Complainant vs. Lea Land, Inc. Robert G. Hall, and Kenneth Slaughter

Real Property Location: New Mexico; (2009 – L & M/A)

Retained for litigation support on behalf of defendant and named as testifying expert. Conducted document and regulatory statute review. Reviewed other expert reports and videotaped testimony of parties to the suit. Provided statutorily defensible documentation to Counsel regarding solid waste management and disposal practices. Deposition was pending prior to settlement.

Compass Bank, As Successor In Interest to the Laredo National Bank vs. Walter C. Keller Distributor, Inc., and Tom Yates Petroleum Co., Inc., Civil Action No.: L-08-CV-68; in the United States District Court for the Southern District of Texas, Laredo Division

Real Property Location: Laredo, Texas; (2008 to present – L & D)

Consultant retained as fact and expert witness by plaintiff's counsel for formal deposition in the matter of environmental impact (trespass) to real property (owned by plaintiff). Prepared environmental due diligence documents, conducted comprehensive review of state LPST file for site and surrounding property, conferred with other named experts as well as owner representatives, conducted walking assessment of the property, conducted comprehensive Phase I and II ESA (soil, ground water and soil vapor testing) as well as indoor air sampling and vapor intrusion assessment. Prepared Site Investigation Report (SIR) and preliminary remedial action plan as well as cost estimates for plaintiff's counsel in support of settlement. Reviewed other expert reports and prepared rebuttal. Testified during video deposition on multiple occasions – case continues.

Metropolitan Transit Authority of Harris County for Condemnation Consulting for Light Rail Expansion

Real Property Location: Houston, Texas; (2008 to present - L)

Retained by counsel representing METRO Transit Authority (MTA) to prepare environmental assessment reports for use by MTA in development of light rail expansion. Conducted peer review of third party reports and evaluated files for preparation of cost estimates for counsel and MTA use in condemnation process. Represent MTA in formal meetings prior to condemnation hearings as necessary in defense of remediation estimates for establishment of fair market valuation. Also, conducted numerous Phase I and Phase II ESAs (specific locations were not locations for consulting opinion prior to condemnation) that have furthered the light rail expansion project.

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Debra Bryson and Brad Bryson, et. al., vs. Big Tex Management, Inc. and Honeywell International Inc.; Cause No. D-1-GN-08-001143; In the District Court of Travis County, Texas, 53^d Judicial District

Real Property Location: Austin, Texas; (2008 – L)

Retained as expert witness on behalf of defendant and named as testifying expert. Conducted site inspections and documented conditions within plaintiff-owned property that is alleged to be impacted by biological contamination. Prepared deliverable (expert report) for use by counsel to establish actual site conditions. Reviewed other expert reports and interviewed parties to the suit. Case settled October, 2009 prior to scheduled deposition.

Memorial Hermann Hospital System vs. Anslow-Bryant Construction, LTD et al; No. 2010-55665; in the 55th Judicial District Court of Harris County, Texas; and MC Medical Campus, LP vs. Anslow-Bryant Construction, LTD et al; No. 2011-24838; in the 55th Judicial District Court of Harris County, Texas

Real Property Location: Houston, Texas; (2008 to present - D & L)

Retained as technical expert and named witness relative to construction contractor (builder) defect claim. Conducted periodic field assessments and multiple events of site sampling due to impact to real estate by moisture intrusion and ensuing mold; estimated fee for remediation, conferred with counsel and other experts. Rendered formal opinion as requested, and conducted multiple pre and post Hurricane Ike inspection reports detailing moisture impact/intrusion. Provided opinion as to the methods of repair/reconstruction and the magnitude of loss. Litigation pending as related to underwriting dispute and multiple builder defects.

David Taylor Cadillac Company., and David Taylor Jr. vs. Taylor Realty Co., LP, T/Realty Manager-I, LLC, and Susan Taylor; No. 2008-75330; in the 129th Judicial District Court of Harris County, Texas

Real Property Location: Houston, Texas; (2008 to 2011 - D & L)

Retained by defendant to conduct real property assessment (including soil and groundwater testing) at operating commercial facility impacted by petroleum hydrocarbons resulting from a “former (historical) spill event” and Site historical use. Initially retained as consultant for real property assessment and characterization for TRRP and VCP application. Retained by plaintiff as technical expert and fact witness for COC trespass, remediation, cost estimation, consultant for pre-trial mediation and testimony. Prepared environmental due diligence documents, conducted comprehensive review of technical reports and State regulatory files for the site, conferred with other named experts as well as owner representatives, and conducted walking assessment of the property. Prepared Site Investigation Report (SIR), Affected Property Assessment Report (APAR) and preliminary remedial action plan as well as cost estimates for plaintiff’s counsel in support of settlement. Prepared expert report and rebuttal. Testified during video deposition. VCP solicitation was approved by the State.

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Big Tex Grain Company Superfund Site – Non-NPL (formerly operated as a W.R. Grace Site) & U.S. EPA Region 6 CERCLA Docket No. 06-10-07 Proceeding Under Sections 104, 106(a), 107 and 122 of the CERCLA, as amended, 42 U.S.C. §§ 9604, 9606(a), 9607 and 9622 – Administrative Settlement Agreement and Order on Consent for Removal Action; CERCLIS ID No.: TXN0006066634; Contract No.: EP-W-06-042.

Real Property Location: San Antonio, Bexar County, Texas; (2007 to 2009 – L & M/A)

Client/owner's technical expert for high profile case with unique COC hazard and alleged public risk. In representation of real property owner, evaluated impact to real property and assisted in diminution of value evaluation, which was allegedly caused by discharge of hazardous material/wastes (Libby Amphibole Asbestos) onto the ground during Site use by a former occupant, and industrial activity formerly conducted by W. R. Grace. Conducted field assessment, reviewed and critically opined with regard to other expert reports and methodology, prepared sampling protocol for client and EPA review, conducted comprehensive review of site and contaminant-related historical litigation and data review, conferred with counsel and other experts, represented client/owner at hearings with certain TCEQ, Region 6 EPA, the City of San Antonio, and Local City Council and State Representatives. Conducted and/or prepared forensic expert research, conducted comprehensive historical review, prepared technical submittals, statistical analyses, expert reports, and comprehensive remediation cost estimates for real property damage.

American Door Products, Inc. f/k/a A.J. May, Inc. vs. Trammell Crow Company; First Industrial Realty Trust. L.P., & Sealy Company; Cause No. 2006-57352; In the District Court of Harris County, Texas, 295th Judicial District

Real Property Location: Houston, Harris County, Texas; (2006 to 2010 – D & L)

Initially retained by lender and later by real property owner (plaintiff in this case) to conduct real property due diligence assessment in support of lender requirements to refinance debt associated with the real estate. Conducted Phased Assessments as per ASTM, entered the site into the TRRP VCP after environmental impact was found, ensured ongoing client compliance with requirements of TCEQ programs (to remain in current good standing) and assisted client and client counsel in preparing necessary deliverables and remediation cost estimates for cause. Deposed multiple times in formal setting by counsel for defense and assisted plaintiff's counsel in efforts to represent mutual client.

The real property enjoys TCEQ RAP approval, corrective action is ongoing and cause settled days prior to trial (2010). Efforts also involved testimony under oath in a formal proceeding (January 2010) related to Daubert Challenges on four issues. The challenge was denied in Ms. Franks/plaintiff's favor (bench ruling) following testimony under oath.

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Klein Bank vs. Spectrum Construction Services, Inc. and Haltner & Associates, Inc. (Cause No. 2003-57351I); 281st Judicial District Court of Harris County, Texas

Real Property Location: Klein, Harris County, Texas; (2006 – D & L)

Retained by plaintiff as fact witness & testifying expert for alleged damage to real property and diminution of value related to construction contractor building defect. Assessed damage to building for biological growth including mold, conducted comprehensive field assessment and performed various site sampling efforts. Conferred with counsel and other experts, represented client/owner at formal meetings, conducted forensic & invasive evaluation (with Engineering and Architectural experts) to establish cause of loss, prepared expert reports, and prepared cost estimates for remediation and repair. Testified under oath in formal deposition.

Mamo et al., vs. BP P.L.C. et al., In The United States District Court for the Eastern District of Virginia, Alexandria Division; Case No.: 1:05cv1323 (JCC)

Real Property Location: 181 Retail Gasoline Stations in Washington, D.C., Virginia, and Maryland; (2006 - L & D)

Dag Petroleum Suppliers, L.L.C., required assistance in due diligence assessment, comprehensive regulatory file review and preparation of retrofit and “cost to close” estimates for site remediation of 181 retail fuel locations. Specialized efforts conducted included contact with multiple regulatory agencies to establish local and state regulatory authority, rendering opinion relative to site compliance status and action required to carry LUST cases forward, review of materials within virtual data rooms following “clearance” by and under the authority of seller and expedited work product delivery within a very compressed time frame. Select Site visits were conducted as necessary. Following completion of technical work, yet not as a result of technical outcome, Client became involved in litigation (as plaintiff) in U.S. District Court. Four counts of complaint were filed; including violation of implied covenant of good faith and discrimination. Deposition was ordered and carried out by the court in this case (and used in formal proceedings by video) and involved qualification of expertise and a demonstration and discussion of actual findings, research practices, and a review of tools and methodology used to arrive at remediation and case closure estimates.

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Metal Coaters Operating, L.P. v. Lawrence W. Kohlmeyer, LWK-WPOH Liquidating, Inc., and LWK-SW Liquidating, Inc., et. al. Cause No. 200405898: in the District Court of Harris County, 189th Judicial District

Real Property Location: Houston (Ship Channel), Harris County, Texas; (2005 - M/A & L)

Retained by plaintiff as fact witness & testifying expert due to environmental impact to real property. Assisted in calculating diminution of value estimates that was caused by alleged illegal discharge of hazardous materials by others. Conducted field assessment, emergency response, performed site sampling as necessary for PCBs, petroleum hydrocarbons and priority pollutants (metals). Conferred with counsel and other experts, represented client/owner at hearings with TCEQ, conducted forensic expert sampling and research duties, performed comprehensive historical review, data reduction, prepared expert report, and prepared cost estimates for apparent real property damage that was presented during mediation in support of final settlement.

Joanne F. Hayford et. al. vs. Kerr McGee Oil & Gas, Inc., Sun Oil Company, Vista Resources, LLC, and Pan OK Production Company, Inc. - Cause No. 83049 in the District Court, Acadia Parish, 15th Judicial District

Real Property Location: Lafayette, Louisiana, Acadia Parish; (2005 - M/A & L)

Retained by defense as testifying expert for alleged damage to real property. Conducted field assessment, performed site sampling due to alleged real property impact by asbestos and petroleum hydrocarbons, conferred with counsel and other experts, prepared formal expert report including cost estimates for alleged damage presented during mediation. Case settled successfully following mediation/arbitration.

Christus St. Joseph Hospital vs. Turner Construction Company of Texas, et al; No.: 2003-31315; in the 281st Judicial District of Harris County, Texas

Real Property Location: Houston, Texas; (2004 - L)

Litigation support consultant and fact witness relative to construction contractor (builder) defect claim. Supported cause in conducting comprehensive biological impact assessment of the healthcare facility, provided expert report, established cause of loss and source of moisture intrusion, determined ensuing mold damage and prepared comprehensive protocol for remediation. Assisted plaintiff in overseeing remediation activity and conducted clearance assessment and testing as necessary. Attended formal meetings to effect resolution of the case.

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Michael Harness on Behalf of OSYKA Producing Company, Inc. vs. Louis Cognata and Mona B. Cognata; (multiple cases, countersuit & court appearances) in the District Court of Harris County, Inc., 190th Judicial District

Real Property Locations: Marion Williams and VA Lawrence Leases, Harris County, Texas; (2004 - D, M/A and L)

Retained by plaintiff as fact witness & testifying expert for assessment of damage to two tracts of real property alleged by owners to be the site of comprehensive environmental damage caused by Client's operations under its lease. Material diminution of value was alleged due to complaint of discharge of petroleum products and production fluids/hazardous materials to lease property during E&P activity and cancellation of lease by owner. Conducted field assessment, performed expedited remediation of surface spills and sub-surface releases, successfully removed all impacted media from each site, performed site sampling and post remediation confirmation testing (as ordered by the presiding judge). Conferred with counsel and the Texas Railroad Commission as well as other experts, researched applicability of certain TRRC clean-up requirements vs. TCEQ requirements under a Memorandum of Agreement, attended court ordered hearings and testified under oath. Presented expert report and formal submittal that included cost estimates for real property damage that was presented during final hearings in support of petition settlement.

South East Texas Regional Planning Commission (SETRPC) vs. MKC Energy Investments, Inc., Cause No. E-166,061 in the 60th Judicial District Court of Jefferson County, Texas,

Real Property Location: Port Arthur, Jefferson County, Texas; (2003 - D & L)

Retained by plaintiff as fact witness and testifying expert. Conducted field assessment, performed site sampling, conferred with counsel and other experts, prepared expert report and testified under oath. Case was related to loss of commercial space by client due to the presence of alleged biological impact related to reported building defect and delayed maintenance.

Thomas Wright, M.D. vs. State Farm Lloyds Insurance Co., et al, Cause No. 2003-31907 in the 80th Judicial District Court of Harris County, Texas,

Real Property Location: Houston, Harris County, Texas; (2003 - D & L)

Retained by defendant as fact witness, consultant and testifying expert. Conducted field assessment and site sampling due to alleged impact to real estate by moisture intrusion and ensuing mold; estimated fee for remediation, prepared abatement protocol, conferred with counsel and other experts, represented client at meetings with plaintiff, rendered formal opinion and rendered multiple expert reports. Provided testimony under oath.

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Coastal Marine Service of Texas, Inc. vs. Intracoastal Environmental Services, Inc., No.: D-162.104, 136th Judicial District Court of Jefferson County, Texas; and I.E. Systems, L.C. dba Intracoastal Environmental Services, Inc. (Debtor), Case No. 98-36817, Chapter 7 in U.S. Bankruptcy Court, Northern district of Texas, Dallas Division

Real Property Location: Port Arthur (Ship Channel), Jefferson County, Texas; (1999 – L & M/A)

Retained by plaintiff in performance of multiple roles in providing the real property owner (and counsel) with environmental consulting support and technical expertise used in litigation related to this now closed marine vessel cleaning and re-furbishing facility. At least three legal proceedings commenced and took place over multiple years. Performed consulting, expert witness and technical support during condemnation hearings and during long term remediation (carried out under personal oversight) to effect eventual case closure. Efforts were wide ranging and included not only comprehensive site characterization of soil and groundwater but estimation of the value of damage caused by others, preparation of expert reports to be used by counsel and personal appearances at formal meetings.

Po-Boy Beverage Corp. and Po-Boyz, Ltd., (Collectively, the “Po-Boy Parties”) vs. Star Enterprise, Motiva Enterprise’s LLC, Harris County, Houston, Texas (supporting case number not provided by counsel)

Real Property Location: Houston, Harris County, Texas; (1998 – L & M/A)

Retained by plaintiff as fact witness and expert witness for estimating value of damage to real property and cost of remediation of property in compliance with TNRCC (now TCEQ) directives. Conducted field assessment, agency representation, site sampling and prepared fee estimates for removal of PSTs formerly closed in place with hazardous materials (drilling mud), conferred with counsel and other experts, represented client at hearings with defendants, conducted forensic efforts (fuel fingerprinting), rendered formal opinion, performed comprehensive file review related to property damage (and diminution of value claim), data reduction, and expert report preparation inclusive of cost estimates.

Elizabeth B.N. Park, Deceased; No. 278,430-401; Texas Commerce Bank Association, as Independent Administrator with Will Annexed of the Estate of Elizabeth N. Park, Deceased vs. Maintenance Engineering Corporation, et, al; In Probate Court No. 3 of Harris County, Texas (involving real property at 10th and Dove Streets, McAllen, Texas)

Real Property Location: McAllen, Hidalgo County, Texas; (1997/8 - L)

Retained by financial institution (fiduciary) in performance of environmental expert work relative to deeding of property to others and managing potential third party claims. Conducted comprehensive due diligence via applicable regulatory programs considering multiple jurisdictional concerns; prepared site characterization (Phase II ESA) report and other deliverables for use and reliance on behalf of multiple parties in resolution of this case, attended meetings and hearings as necessary in support of client and client’s counsel.

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Partition Action between Texas Commerce Bank, N.A., and Owners of Real Property in Undivided Interest; No. 01-98002; 10th & Dove Street, McAllen, Texas

Real Property Location: McAllen, Texas; (1996 –D & L)

Retained as technical expert and deposed witness for financial institution holding the subject property in trust on behalf of multiple parties prior to partition action being finalized. Conducted comprehensive file review of historical technical (environmental) reports prepared by others related to oil and gas exploration and production. Performed phased site assessments including site characterization/testing, conducted historical research into former E&P use of property, conducted events of soil and groundwater sampling and prepared detailed (peer reviewed) remediation cost estimates and expert report during formal deposition.

J.J. Gregory Gourmet Services, Inc. (Case No. 96-42469-H4-11) and M.J. Antone, Inc. (Case No. 96-42601-H4-11) and Hamlet Restaurant Group, Inc., in purchase of substantially all assets of debtors; Confirmation Hearing in Bankruptcy Court; Judge William Greendyke, presiding, Harris County, Texas; & in conjunction with the Natural Resources Division of the Office of the Assistant Attorney General, Austin, Texas

Real Property Location: Houston, Harris County, Texas; (1996 - D & L)

Retained by proposed successor of debt as fact witness and testifying expert for estimating value of damage to real property and cost of remediation in support of usurping debtors claims. Conducted field assessment, agency representation, site sampling, estimated fee and later removed PSTs formerly closed in place with hazardous materials (drilling mud), conferred with counsel and other experts, represented client at preliminary hearings/meetings, conducted forensic (fuel fingerprinting) expert testing and rendered expert opinion. Performed comprehensive historical review, data reduction, prepared expert report inclusive of cost estimates and testified under oath in bankruptcy court.

Reef Industries, Inc. vs. Remedial Construction Services, Inc.; No. 95-08842; in the 189th Judicial District Court of Harris County, Texas

Real Property Location: Houston, Texas; (1996 - D & L)

Retained by defendant to conduct real property assessment (including soil and groundwater testing) on operating industrial facility alleged to have been impacted by chlorinated solvents resulting from a “former (historical) spill event”. Testified under oath as expert witness and provided detailed cost estimates for remediation and reclamation of environmental damage. Attended multiple meetings and rendered expert opinion in review of prior case files, opposing expert opinion and historical reports/technical documents prepared by others.

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