

Pete Fowler  
**CONSTRUCTION**  
Services, Inc.

JN/Name 00-173 Page 1  
Date 2/2/01 By GW  
Deponent: Scott Street Title Plaintiff  
Expert

Page	Line	Description
2-3	7-19, 6-8	Expert witness for plaintiffs. Scope: to inspect the homes and do an analysis of the architectural components of the homes including exterior finishes, windows, interior finishes, waterproofing of the decks and flashings. Prepared to give his full and final findings in this case.
3-4	26-27, 3-7	He's been deposed 14 times; every time was as an expert witness.
7-8	3-4, 12-18, 15	B.S., Architectural Studies, U. of Nebraska, 1984. Licensed as an architect in California, Arizona and Colorado. Ongoing education with AIA.
9, 16	7-16, 26- 28, 2-7	Employed by Smith Architects about ten years; vice president. Architectural firm specializing in forensic investigations. Design work is about 5% of their business. He's never been the architect of record for a tract development.
19, 20, 21	7-8, 15-16, 27-28, 24- 28, 12-13	First visited the site in July 2000. Exhibit 2152: summary of time spent including his time versus his staff. Was out there for a "good portion of the site inspection", and "most of the D.T." Took extensive notes.
26-28	2-5, 16-19, 22, 27-28, 1-4, 7-13, 15-28, 8- 10	In his opinion, none of the defects are a result of design deficiency rather than workmanship. Craftsman series homes had Pella windows. Exhibit 2153: his matrix created from the subcontractor's contracts and a summary from the attorney's office. Mission series homes were manufactured by Sierra Pacific and Kolbe. Norco also manufactured some windows but did not specify which series. He evaluated all three of these products and found them fairly consistent; he did find some dry rot and separation of sashes and frames.
28-30	21-28, 1, 2-7, 27-28, 3-4, 16-18	He believes he water tested at least one window from each manufacturer but he did not water test every window involved in this case. Exhibit 2154: Matrix of Findings dated March 14, 2002 identifies the windows that were tested; that's his entire window matrix. He used his field notes to create the matrix.
31-32	23-28, 1-2, 14-18	The cost of repair information in this case was provided by Ken Kapoi with Valentine Construction. He's seen the Cost Estimate but he hasn't gone through it line by line to see if the repair cost estimates match his repair scope of work.
32-33	19-20, 1-4, 9-13	He decided where D.T. would be conducted with some input from his staff. He believes that A. B. Builders performed the D.T.
34-35	25-28, 1- 16	At the Artisan series which had vinyl windows with wood trim, the Southwest or Summit vinyl windows performed "horribly" while the Sun Air windows performed well.
35	17-21	His report revised 22/22/02 and 3/14/02 is the full and complete list of all defects that he identified at Mt. Woodson.
36-40	16-18, 2- 28, 1-2, 13-16, 5, 2-22	He and his staff performed the water testing using spray racks he designed according to ASTM standard and AAMA specs and Bruce W., a general contractor, fabricated them. The racks were not approved by ASTM or AAMA and no independent lab ever analyzed them.
43-45	18-28, 11- 15, 1-9	16.1.01 is general window system failure for wood windows – where they observed existing stains. Matrix shows how many windows were found to be defective at specific addresses.