# Sacramento Unified School District

# VS.

# Fred B. Curtis, Inc. Updated 11/5/08

Borton, Petrini & Conron CONGLAS guarantee files and correspondence generated prior to litigation Pleadings generated by or on behalf of CONGLAS as of the date of lodgment Legible copies of documents deposited previously by CONGLAS	CF CF CF	1-152 153-198 199-291
Glaspy & Glaspy Curtis Roofing job files and correspondence generated prior to litigation Pleadings and discovery generated by or on behalf of Curtis Roofing as of the date of this lodgment		0-893 894-1110
Anwyl, Scoffield & Stepp -Binder 1 Progress Payments Sacramento City Unified School District 1998 Re-Roofing Program -Binder 2	MT MT	1-78 79-299
Sacramento City Unified School District 1998 Re-Roofing Program Sacramento City Unified School District 1998 Re-Roofing Program (Duplicate) Close-out Manual for Re-Roofing Project -Binder 3	MT MT MT	300-323 324-568 569-749
Close-out Manual for Re-Roofing Project Bid Package #3 Matriscope file Contract File Bid Pack # 3-98-C16-Curtis file Job file and notes for re-roofing project -Binder 4	MT MT MT MT MT	750-832 833-898 899-1046 1047-1080 1081-1244 1245-1299
Job file and notes for re-roofing project Sacramento City Unified School District 1998 Re-Roofing Program (Duplicate)	MT MT	1300-1587 1588-1839
Cox & Associates  Daily reports by inspector in re-roofing of Fern Bacon School	CA	1-68
Law Offices of Samuel Grader Field's Corporation's job file	FC	1-713
Gerard & Vinson (file now part of Kronick, Moskovitz, et al.) Floorplans (See Statements/Responses Binder)	SC	1-8

# Kronick, Moskovitz, Tiedemann & Girard / Barth Tozer & Timm

Binder 1	1-548
Binder 2	549-1039
Binder 3	1041-1486
Binder 4	1487-1928
Binder 5	1929-2420
Binder 6	2421-2849
Binder 7	2850-3300
Binder 8	3301-3627
Binder 9	3628-3985
Binder 10	3986-4383
Binder 11	4384-4799
Binder 12	4800-5382
Binder 13	3040-3334

# (Detailed index below provided by Kronick, et al)

Re-Roofing Project, contractor reference questionnaire 1997 SC 5	5
	•
Re-Roofing Project, contractor reference questionnaire 1997 SC 8	3
Handwritten notes titled: CONGLAS projects 4/6/98 SC 3	335-336
Basic information required of bidder, section D, page 15 5/6/98 SC 4	447
Basic information required of bidder, section D, page 16 SC 4	448
Experience/performance/references section F, page 18 5/6/98 SC 4	450
Page 23 of bid package 5/6/98 SC 4	455
Page 23 of bid package 5/6/98 SC 4	466
Page 18 from bid package SC 4	471
	473
, , , , , , , , , , , , , , , , , , , ,	474
, , ,	478-480
	573-634
,	1052-1055
,	1058-1060
,	1068-1072
,	1073-1078
,	1079-1080
,	1083-1086
,	1087-1088
•	1089-1093
,	1094-1095
	1096-1097
,	1098-1099
, , , , , , , , , , , , , , , , , , ,	1100-1102
, , , , , , , , , , , , , , , , , , ,	1103-1104
,	1105-1109
,	1110-1111
, , , , , , , , , , , , , , , , , , ,	1112-1114
Payroll records re Collins P. Huntington Elementary 8/28/98 SC 1	1115-1116

Payroll records re John Still School 8/13/98 Payroll records re Hiram Johnson West Campus 8/13/98 Payroll records re Earl Warren School 8/13/98 Payroll records re John Still School 8/6/98 Payroll records re John Still School 8/6/98 Payroll records re John Stoat Elementary 8/6/98 Payroll records re Hiram Johnson West Campus 8/6/98 Payroll records re Fern Bacon Middle School 10/22/98 Payroll records re Fern Bacon Middle School 10/22/98 Payroll records re Fern Bacon Middle School 10/16/98 Payroll records re Fern Bacon Middle School 10/16/98 Payroll records re Golden Empire Elementary 10/16/98 Payroll records re Golden Empire Elementary 10/16/98 Payroll records re Golden Empire Elementary 10/8/98 Payroll records re John D. Sloat Elementary 10/8/98 Payroll records re John Still School 10/8/98 Payroll records re Fern Bacon Middle School 10/8/98 Payroll records re Fern Bacon Middle School 10/8/98 Payroll records re Colis P. Huntington 10/8/98 Payroll records re Earl Warren Elementary 10/8/98 Payroll records re Golden Empire School 10/1/98 Payroll records re Earl Warren School 10/1/98 Payroll records re C.P. Huntington School 10/1/98 Payroll Records re John Sloat School 10/1/98 Payroll Records re John Still School 10/1/98 Payroll Records re Thomas Jefferson School 9/24/98 Certified Payroll Report for John Still School 9/24/98 Certified Payroll Report for John Still School 9/17/98 Certified Payroll Report for John Still School 9/17/98 Certified Payroll Report for Fern Bacon Middle School 9/17/98 Certified Payroll Report for Fern Bacon Middle School 9/17/98 Certified Payroll Report for Fern Bacon Middle School 9/17/98 Certified Payroll Report for John Still School 9/17/98 Certified Payroll Report for Fern Bacon Middle School 9/17/98 Letter 4/2/98	555555555555555555555555555555555555555	1117-1121 1122-1123 1124-1127 1128-1131 1132-1135 1141-1142 1143-1149 1150-1153 1154-1161 1162-1167 1168-1169 1170-1171 1172-1174 1175-1176 1177-1182 1183-1186 1187-1189 1190-1191 1192-1193 1194-1195 1196-1197 1198-1199 1200-1201 1202-1205 1206-1208 1209-1214 1215 1218-1222 1223-1225 1226-1228 1237-1240 1241-1242 1792 2233-2236
Re-Roofing Contract Contractor Reference Questionnaire 1997	sc	3807, 3810, 3813
Re-Roofing Contract Contractor Reference Questionnaire 1997 Re-Roofing Contract Contractor Reference Questionnaire 1998 Basic Information Required of Bidder Section D 5/4/98 Page from Bid Package 5/4/98 Experiences/Performance/References Section F 5/4/98 Page from Bid Package 5/4/98 Financial Statements of 3/31/97 Supplementary Information of 3/31/97 5/4/98 Re-roofing contract contractor reference questionnaire 1997 Re-roofing contract contractor reference questionnaire 1996 Re-roofing contract contractor reference questionnaire 1996	SC SC SC SC SC SC SC SC SC SC	3810 3813 3821 3823 3825 3830 3845-3854 3857-3865 3866 3869 3872

Basic information required of bidder section D 5/4/98	SC	3880
Page from bid package 5/4/98	SC	3881
Superintendent resume 5/4/98	SC	3883
Experiences/performance/references section F 5/4/98	SC	3885
Page from bid package 5/4/98	SC	3890
Contractor's qualification questionnaire question # 28 5/4/98	SC SC	3891
Basic information required of bidder section D 5/8/98	SC	3904 3905
Page from bid package 5/8/98 Completed public works contracts 5/8/98	SC	3908
Page from bid package 5/8/98	SC	3913
Production comments 5/8/98	SC	3914
Financial statements and supplementary information of 1996 & 1997 10/16/96	SC	3923-3939
Re-roofing contract contractor reference questionnaire 10/16/96	SC	3940
Re-roofing contract contractor reference questionnaire 9/11/97	SC	3943
Re-roofing contract contractor reference questionnaire 10/31/97	SC	3946
Basic information required of bidder section D 5/15/98	SC	3951
Page from bid package 5/15/98	SC	3952
Page from bid package 5/15/98	SC	3955
Page from bid package 5/15/98	SC	3960
Re-roofing contract contractor reference questionnaire 1995	SC	3973
Re-roofing contract contractor reference questionnaire 1997	SC	1973
Re-roofing contract contractor refernce questionnaire 1994	SC	3984
Balance sheet as of 12/31/98 5/15/98	SC	3989-3990
Basic information required of bidder section D 5/18/98	SC	3998
Page from bid package 5/18/98	SC	3999
Experiences/performance/references section F 5/18/98	SC	4003
Page from bid package 5/18/98	SC	4008
List of projects under contract 5/18/98	SC	4009-4010
Balance sheet as of 12/31/97 5/18/98	SC	4017-4033
Basic information required of bidder section D 5/4/98	SC	4039
Page from bid package 5/4/98	SC	4040
Experiences/performance/references section F 5/4/98	SC	4042
Page 23 from bid package 5/4/98	SC	4047
Re-roofing project contractor reference questionnaire 1993	SC	4054
Basic information required of bidder section D 5/5/98 Page from bid package 5/5/98	SC SC	4062 4063
Major projects in the past five years for Robert McDonough and Mike Neuman	30	4003
5/5/98	SC	4064-4065
Experiences/performance/references section F 5/5/98	SC	4067
Page from bid package 5/5/98	SC	4072
Contractor's qualification questionnaire question #28 & #30 5/5/98	SC	4073-4074
Re-roofing contract contractor reference questionnaire 1994	SC	4081
Re-roofing contract contractor reference questionnaire 1997	SC	4084
Re-roofing contract contractor reference questionnaire 1995	SC	4087
Re-roofing contract contractor reference questionnaire 1997	SC	4090
Re-roofing contract contractor reference questionnaire 1998	SC	4093
Basic information required of bidder section D 5/8/98	SC	4096
Page from bid package 5/8/98  Experiences/performance/references section E 5/8/98	SC SC	4097 4103
Experiences/performance/references section F 5/8/98 Page from bid package 5/8/98	SC	4112
i age nom blu package 3/0/30	30	7114

Work in progress/pending contracts 5/8/98 Financial statements and supplemental information of 4/30/97 5/8/98	SC SC	4113-4114 4123 & 4126-4135
Re-roofing contract contractor reference questionnaire 1997 Payroll records for the Gustine High School re-roof 1/31/98 Public works-initial report 10/10/97	SC SC SC	4136 4325-4327 4332
Page from bid package 5/13/98 Documents	SC SC	4352-4358 4359-5347
Work order reports for the following schools: Collis P. Huntington; Earl Warren; Golden Empire; John D. Sloat; John H. Still; Fern Bacon; Thomas Jefferson;	0.0	
and Hiram Johnson	SC	5348-5374
Privilege Log Fax 11/17/99	SC	1548-1563
Fax 5/13/03	SC SC	1672
Memorandum 4/15/98	SC	1856
Fax 7/13/98	SC	2326
Fax 2/26/98	SC	3553
Letter 4/12/04	SC	3678
Fax 2/23/04 Fax with attached handwritten message 12/5/03	SC SC	3679 3680
Fax with attached documents 6/30/04	SC	3701-3727
Letter 5/21/03	SC	3728
Letter 5/21/03	SC	3728
Letter 1/3/03	SC	3729
Letter 6/24/03	SC	3731
Fax 6/26/03	SC	3733-3734
Letter 5/9/03	SC	3778
Letter 6/11/03	SC	3779-3782
Fax 6/16/03	SC	3783-3784
Letter 11/18/03 Email 8/26/03	SC SC	3806 4508
Sacramento City Unified School District inspector contract	SC	5375-5382
Work order reports for the following schools: Collis P. Huntington; Earl Warren; Golden Empire; John D. Sloat; John H. Still; Fern Bacon; Thomas Jefferson and Hiram Johnson	SCUS	SD 3040-3334
Porter, Scott, Weiberg & Delehant		
School report summaries	MAT	1-89
Matriscope's project file	MAT	90-104
Daily field reports	MAT	105-419

# **Statements/Notices/CMO's**

#### Borton, Petrini & Conron

- Statement of work by Consolidated Fiberglass Products Company
- Statement of insurance by Consolidated Fiberglass Products Company
- Consolidated Fiberglass Products Company's answer to third amended complaint

#### Samuel G. Grader

• Case management statement (9/22/04)

### Girard & Vinson

- Substitution of attorney
- Stipulation and proposed order to sustain Conglas' special demurrer to counts III, V, VI, and VII of plaintiff's third amended complaint with leave to amend

#### Glaspy & Glaspy

- Answer by defendant Fred B. Curtis, Inc., Curtis Roofing and Fred B. Curtis, individually, tom plaintiff's third amended complaint
- Notice of entry of dismissal
- Notice and acknowledgment of receipt-civil
- Statement of work by Curtis Roofing
- Statement of insurance by Curtis Roofing
- Letter to Mr. Scoffield regarding McLean & Tillotson Construction's application for determination of good faith settlement, dated July 2, 2007
- Defendant Curtis Roofing's Disclosure of expert witness information and declaration of Kevin M. Clarke
- Notice to counsel that the deposition of the PMK for Consolidated Fiberglass scheduled for August 9, 2007 has been taken off and will be rescheduled, dated August 3, 2007
- Declaration of Kevin M. Clarke in support of defendant Fred B. Curtis, Inc's opposition to Consolidated Fiberglass Products Co.'s motion for good faith settlement determination, dated August 1, 2007
- Defendant Fred B. Curtis, Inc.'s memorandum of points and authorities in opposition to Consolidated Fiberglass Products Co.'s motion for good faith settlement determination
- Letter to counsel re: PMK for Consolidated Fiberglass, dated August 3, 2007
- Letter to Judge MacMaster re: Curtis Roofing, dated August 24, 2007
- Mandatory settlement conference statement of defendant Fred B. Curtis, Inc., dated September 17, 2008
- Deposition subpoena PMK Fern Bacon Middle School, dated September 19, 2008
- Deposition subpoena PMK John Still High School, dated September 19, 2008
- Deposition subpoena PMK Collis P. Huntington School, dated September 19, 2008
- Deposition subpoena PMK Earl Warren Elementary School, dated September 19, 2008
- Deposition subpoena PMK Golden Empire Elementary School, dated September 19, 2008
- Deposition subpoena PMK Hiram Johnson West Campus, dated September 19, 2008

- Deposition subpoena PMK John D. Sloat Elementary School, dated September 19, 2008
- Deposition subpoena PMK John Still High School, dated September 19, 2008
- Deposition subpoena Richard Cvitanov, dated September 19, 2008
- Deposition subpoena PMK John Still High School, dated September 19, 2008
- Defendant Curtis Roofing's augmented disclosure of expert witness information and declaration of Kevin M. Clarke, pursuant to C.C.P. 2034.260, dated September 25, 2008
- Notice of deposition rescheduling, dated October 1, 2008
- Mediation brief of defendant Fred B. Curtis, Inc., dated October 10, 2008
- Notice of deposition rescheduling, dated October 14, 2008

#### Kronick, Moskovitz, Tiedemann & Girard

- Plaintiff Sacramento City Unified School District's amended third amended complaint
- Preliminary defect list: Case Monitoring Order No. 3, Paragraph 5 (April 14, 2005)
- Bates Stamped diagrams of school sites SC1-8 (Also referenced as Gerard & Vinson documents)
- Sacramento City Unified School District's statement of the estimated cost of repair
- Request for Cox & Associates to deposit materials dated July 7, 2005
- Request for Cox & Associates to deposit materials dated July 21, 2005
- Notice of entry of dismissal The Durrant Group
- Answer by defendant Fred B. Curtis Roofing and Fred B. Curtis, individually, to plaintiff's amended third complaint
- Maps of locations of schools at issue in the litigation

8 pages

- Letter to Rocky Copley dated August 15, 2005
- Letter to Drew Johnson dated August 25, 2005
- Letter to Mr. Tozer dated September 6, 2005
- Letter to Drew Johnson dated October 31, 2005
- Confirmation of mediation dated January 30, 2006

## Law Offices of Samuel Grader

- Statement of insurance (exhibit 'D' of CMO)
- Statement of work (exhibit 'C' of CMO)
- Notice of stay of proceedings dated September 1, 2005

#### Porter Scott Weiberg & Delehant

- Answer to cross complaint
- Answer to amended third amended complaint
- Statement of insurance
- Statement of work

# Law Office of Rocky Copley

- First exchange of expert witness information by defendant/cross-defendant Consolidated Fiberglass Products Company
- Designation of person most knowledgable for defendant/cross-defendant Consolidated Fiberglass Comany