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CONSTRUCTION
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Project Management Skills
for Litigation

Summary

Successful management of projects is hard, especially with lots of parties involved and more things to do than you can keep together in your mind, or even in your day-planner. A Project Management system is the closest thing we have to a guarantee of success. This presentation will cover: difficulties and barriers to project management; steps for successful project planning; the science of project management; planning for and managing meetings while tracking accountability; time management and weekly plans; and tracking your time for billing.

Pete Fowler Construction Services, Inc. (PFCS) is a team of consultants with expertise in all phases of building construction including design, estimating, construction management, inspection, testing, repair, construction defect forensics, and training. We specialize in *delivering professional solutions* for building projects in distress, dispute, or litigation, and in expert witness testimony. We listen to our clients' individual needs, evaluate their unique situation, and use our proven systems to deliver comprehensive solutions with excellence, value, and integrity. Our methods are designed to guide clients through their situation in the fastest, most cost effective way, creating actionable information everyone can use to make informed decisions.

Summary Outline

1. Introduction (10 Minutes)
2. Project Planning (10 Minutes)
3. The Science of Project Management (10 Minutes)
4. Meeting Management (10Minutes)
5. Weekly Planning (10 Minutes)
6. Conclusion (10 Minutes)
7. Back-Up Documents (0 minutes)

Agenda

1. *Introduction (10 minutes)*
   A. Play video #1
   B. A Case to Paralegals = a Project
   C. Brainstorm: What are your biggest frustrations and most difficult barriers to success? Are most lawyers naturally organized and good at project management?
   D. Discuss which difficulties and barriers to success a Project Management System can help with
   E. Abe Lincoln: "*Give me six hours to chop down a tree and I will spend the first four sharpening the axe.*"
   F. Review the Project Plan for this presentation
   G. Discuss the Back-Up Materials
2. *Project Planning (10 minutes)*
   A. OMMA-Goodness! Draw the one-page OMMA Diagram to explain the connections
   B. Objective
   C. Method
   D. <u>Milestones and Deliverables</u>: Explain, then Brainstorm the Milestones and Deliverables in a traditional litigation; begin with discovery and end with trial or settlement. Deliverables should almost always include: Project Plan, Players List, Timeline, Document Index, and One Minute Summary. PFCS has a Menu of Deliverables.
   E. Actions: At least up to the next Project Status Meeting
   F. Review the blank Project Plan form. Discuss alternatives
   G. Explain PFCS' On-Line System
3. *The Science of Project Management (10 minutes)*
   A. Iron Triangle: Draw it
   B. Scope: What is being done
   C. Budget: How much it is going to cost
   D. Schedule: When it is getting done
   E. Work Breakdown Structure (WBS): Explain that this Presentation Outline is a Two-Level WBS
   F. Draw a diagram of how all this works together using the Work Breakdown Structure
   G. Review the OMMA-Goodness PM Terms and Components
4. *Meeting Management (10 minutes)*
   A. Play video #2
   B. Project Planning and Project Status Meetings
   C. MAMA Meeting Management: Meeting Information, Agenda, Minutes and Action Steps
   D. Team Consulting
   E. Actions: S.M.A.R.T.

F. Action Steps from previous meeting are Old Business in the current meeting.
G. Accountability
H. Review the Project Status Meeting How-To Document

5. *Weekly Planning (10 minutes)*
   A. Connecting the plan to the calendar: Draw diagram making the connections
   B. Weekly Planning Form and Calendar: Review them
   C. Values, Mission and Goals
   D. Plans
   E. Master Task List, Hard Calendar, Discretionary Time
   F. Milestones. Deliverables, Big Rocks
   G. Soft Calendar and Action

6. *Conclusion (10 minutes)*
   A. Planning always saves time
   B. Complex projects are hard to keep together
   C. All complex business systems are "engineered" and systematized and require checklists to make sure all of the necessary components are conforming to the requirements of the system
   D. People generally need to know they will be held accountable for their commitments, and building accountability into your system is very helpful
   E. Fundamentals of Project Management (The Iron Triangle): Scope, Budget and Schedule
   F. OMMA-Goodness! Object, Method, Milestones and Actions
   G. MAMA Meeting Management: Meeting Information, Agenda, Minutes, Action Steps
   H. Review the PFCS Project Plan Memo and Scope-Budget Matrix and discuss how it works with billing for time
   I. Play video #3

7. *Back-Up Documents (0 minutes)*
   A. The 1-page Project Plan for this presentation and a one-page Meeting Agenda and Minutes for this program (2 pages)
   B. Blank Project Planning forms (2 pages)
   C. OMMA-Goodness! In-Brief or just the one-page of terms & components
   D. Project Status Meeting Agenda and How To (4 pages)
   E. Weekly Planning forms (2 pages)
   F. Sample PFCS Project Plan Memo and Scope-Budget Matrix with Updates (3-4 pages)

Project Plan

Oregon Paralegal Association Annual Meeting 2010

OBJECTIVE: To give an awesome, 1-hour presentation that teaches the fundamentals of Project Management, applied to paralegals managing complex litigation cases, including composing and maintaining a Project Plan, planning and executing Project Planning Meetings, holding people accountable for their commitments, and connecting all of this to our calendars through Weekly Planning.

METHOD
1. Where Are We? We have a good 1-day training with all of the materials necessary.
2. Where Are We Going? See Objective above.
3. How Do We Get There? Cut the material down to its essence.

MILESTONES
1. DONE Coordinate with OR Paralegal Conference organizers.
2. DONE Initial Outline and Materials delivered
3. IP Compile Back-Up Materials and Deliver by 9/1/10
4. IP Presentation Outline – Detailed. Complete with estimated times
5. Presentation Supplies: Compile supplies and Video on Memory Device
6. Dry Run: Practice in the office
7. Presentation Dispatch
8. Deliver presentation at 1:30 on 10/15/10 in Springfield, OR

ACTIONS
1. DONE Meet to compose the Project Plan for this presentation on 7/27/10
2. PF: Decide if I am staying over at the hotel and go to the party.
3. PF: Compose Meeting Agenda and Minutes conforming with the standards that will be part of the program materials.
4. KT: Cover page for Presentation Package (1 page) to include executive summary of the program, L1 outline and back-up materials list.
5. PF: Finalize presentation outline today, for Dry-Run.
6. KT: compile all Compile supplies and Video on Memory Device, including candy for the day of the presentation, a flip-chart with sticky stuff to post on walls, and new pens.
7. KT: Call event organizers and make sure the audio and video people will be capable of dealing with the videos. Make sure they have an easel.
8. KT: Find a time and calendar for next meeting and dry-run of presentation
9. SS: Anonymize an updated project plan memo and updated scope-budget matrix for use as back-up materials for Conclusion section
10. SS: Review the In-Brief and see what we can do. Should we update and use it? How much work will it take? Spend 1-hour and report at next meeting.
11. PF Deliver Dry-Run on 8/18/10. PF to present this over lunch in the PDX office to SS, KT and anyone else who wants to attend.
12. KT: Update Outline from what we learn in dry-run
13. KT Compose Dispatch
14. Next Meeting with SS, KT and PF: 8/6/10 at 2:00

Project Status Meeting

Meeting Information
- Who: KT, SS, PF
- What: Oregon Paralegal Convention – Project Management in 1-Hour
- When: 8/6/10 at 2:00
- Where: Telephone Conference

Agenda
1. Review Project Plan
2. Old Business
3. New Business

OLD BUSINESS (Actions from last meeting)
1. DONE Meet to compose the Project Plan for this presentation on 7/27/10
2. PF: Decide if I am staying over at the hotel and go to the party.
3. PF: Compose Meeting Agenda and Minutes conforming with the standards that will be part of the program materials.
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13. KT Compose Dispatch
14. Next Meeting with SS, KT and PF: 8/6/10 at 2:00

NEW BUSINESS
1.
2.

Minutes
1.

Action Steps
1.
2. Next Meeting with SS, KT and PF: 8/6/10 at 2:00

A-Team Presentation Formats

9/2/10

TRADITIONAL PRESENTATION FORMAT (Total Time: 49-69 minutes)
1. One-word open (1 minute)
2. Confidentiality Reminder (1 minute)
3. Presenter Purpose & Expectations (2 minutes)
4. Confirm Group Understanding (1 minute)
5. Presenter Presents (10-20 minutes)
6. Reminder of Gestalt protocol
7. Clarification Questions (10 minutes max total)
8. Silence (2 minutes to prepare)
9. Experience Sharing (2-3 minutes each total 20-30)
10. Presenter: Take-Away Value (1 minute)
11. One-word close (1 minute)

NEW PRESENTATION FORMAT (Total Time: 30-45 minutes)
A.   Coaching (15 minutes)
  1. OPEN: (X minutes)
  2. REFLECT: (X minutes)
  3. ANCHOR: (X minutes)
  4. EXPLORE: (X minutes)
  5. COMMUNICATION STARTER: (X minutes)
B.   Experience Sharing (1-2 minute / each, Total 12-24 minutes)
  1. EXPERIENCE SHARING: (X minutes)
C.   Reflection (1 sentence / 15 seconds each / 3-5 minutes)
  1. TAKE AWAYS (XX): (X minutes)

TEAM CONSULTING
1. Chairperson presents the apparent problem
2. Chairperson defines the goal
3. Chairperson states the "how to" question that will accomplish the goal
4. Chairperson presents the facts and background of the problem
5. Team members contribute clear action steps that could solve the problem
6. Chairperson writes down all the suggestions made by team members,
7. Chairperson must be open to suggestions, listen, not be defensive. And definitely not reject ideas
8. Chairperson solicits balanced participation to tap the group's resources
9. Chairperson summarizes all the recommendations
10. Chairperson is responsible for selecting the action steps to which he/she will be committed to resolve the problem

Project Plan for:

_____

Date_____

Objective

Method

	Description	Discussion
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

Milestones & Deliverables

	Description	Priority	Who	When
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

Project Plan for:

Date_____

_____

Actions / Tasks

	Description	Priority	Who	When	Time	$
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
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26						
27						
					-	$ -

Project Management Terms

1. Project: A temporary endeavor, that includes a beginning and an end, to create a product or service.
2. Project Management: The discipline of organizing and managing resources to deliver a defined outcome (Objective / Scope), within the constraints of the Budget and Schedule.
3. Project Manager (or Coordinator): A PM (or PC) is a professional responsible for planning, budgeting, scheduling and managing all project resources, including personnel, to deliver the project Objective; one who executes and follows-up on the Project Plan and reports Project Status.
4. Project Plan: A document that defines the project Objective, Method, Milestones, and Actions; contains a list of documents that define 100% of the Scope, Budget and Schedule.
5. Scope: The Scope of Work is the sum total (100%) of all a project's products and their requirements or features, including all labor, materials and equipment required to complete it; a Scope document is the written representation (100%-summary) of the scope, often best depicted in a Work Break-Down Structure.
6. Budget: An itemized list of expected costs or available funds for a project or specified Scope, often based on the Work Break-Down Structure. A control mechanism to compare to actual expenses.
7. Schedule: A list or graphic of activities and associated dates, often based on a Work Break-Down Structure; may include who is responsible and how activities relate to each other. Common forms are the Bar (Gantt) Chart or Critical Path Method.
8. Objective: A concisely written goal of specific, measurable outcomes including a 100%-summary of the Scope, Budget and Schedule.
9. Milestone: An event that marks the completion of a Deliverable, a Hold-Point on a schedule, or a flag in the Project Plan to highlight completed work; often used to ensure project progress.
10. Deliverable: A measurable, tangible item produced during project execution. Some are external and subject to approval, but some are internal only.
11. Action: A discrete, specific, measurable task, often performed by an individual, usually between 1/10-hour and 8-hours and rarely more than 80-hours.
12. Hold-Point: Milestone or critical stage in a project for verifying conformance with plan or quality standards.
13. Problem-Solving: A learning situation involving more than one alternative from which a selection is made in order to attain a specific goal (Objective); usually to move the situation from where it is to the best available alternative. One METHOD: (1.) Define the Problem (2.) Identify Options (3.) Identify the Best Solution (4.) Plan How to Achieve the Best Solution (5.) Evaluate Results.

OMMA-Goodness!™ Components

14. One Minute Summary: An A to Z, 100%-summary "restatement of the obvious" to describe "who, what, when, where, why, how and how much" (7-W's), in 250 words or less to orient everyone to the big-picture before emersion into the details.
15. OMMA-Goodness!™ Project Planning Form: Planning form with sections for writing the Objective, Method, Milestones & Deliverables, and Actions for a project. For use in Project Planning, Project Planning Meetings and Project Status Meetings.
16. Method: A problem-solving framework or check-list that we apply the specific facts of our project to, as an aid in Project Planning. Some Methods have a check-list or "Menu of Deliverables". EXAMPLES: Scientific Method, AA's 12 Steps, Deming's 14-Points, PMI's 9 Categories and even the 5-W's.
17. Menu of Deliverables (or Milestones): A list of common Deliverables (or Milestones) associated with a specific problem-solving method or project type, used as a check-list during project planning.
18. Project Planning Meeting: A meeting to perform a structured Problem-Solving session. AGENDA: 1. One Minute Summary, 2. Plan Review, 3. Review Scope, Budget & Schedule, 4. Method and Menu, 5. Brainstorming and Update Plan, 6. Update Actions, 7. Arrange Status Meeting. PM (or PC) deliver complete Project Plan following meeting.
19. Work Break-Down Structure (WBS): A project management technique for defining and organizing the total Scope using a hierarchical tree structure. The first two levels (the root node and Level 2) define a set of planned outcomes that collectively and exclusively represent a 100%-summary of the project Scope. At each subsequent level, the children of a parent node collectively and exclusively represent 100% of the scope of their parent node.
20. Earned Value Analysis (EVA): Technique for measuring progress which combines measurement of actual performance of Scope, Schedule, and Budget, organized using a Work Break-Down Structure, and compares them to plan in an integrated methodology.
21. Project Status Meeting: A meeting for a structured review of project progress compared to plan. AGENDA: 1. One Minute Summary, 2. Plan Review, 3. Review Scope, Budget & Schedule, 4. Old Business, 5. Method and Menu, 5. Performance Analysis, 6. New Business, 7. Brainstorming and Update Plan, 7. Update Actions, 8. Arrange Next Meeting. PM (or PC) deliver complete Project Plan following meeting.
22. Brainstorming: An activity used to generate many creative ideas that have no right or wrong answers and are accepted without criticism.

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Project Status Meeting

Date:	September 1, 2006
Meeting Date:	September 21, 2006
To:	Project Team
From:	Project Coordinator
Project:	*OMMA-Goodness! Project Management Training* PFCS Project 07-123
Regarding:	Project Status Meeting Agenda
Attachments:	None
Note:	Confidential Attorney-Client and Attorney Work Product. Protected under all applicable evidence codes.

Meeting Information
1. Who: PM, Expert, Project Coordinator, Technical Lead
2. When: Date. Time. Duration is generally between 7 minutes and 4 hours.
3. Where: In-office, via telephone conference, video conference, etc…
4. Roles: Leader, Timekeeper, Scribe

Agenda
1. One Minute Summary and Project Information Review (1-3 minutes)
2. Project Plan Review: Objective, Method, key Milestones & Deliverables, and key Actions to date (1-5 minutes)
3. Old Business: Actions from previous meeting (0 minutes to 3 hours)
4. Review Scope, Budget & Schedule compared to performance (2 minutes to 3 hours)
5. New Business (0 minutes to 3 hours)
6. Brainstorming/Problem Solving/Team Consulting: Update Project Plan (2-60 minutes)
7. Update Actions (what, who, when, where, how, how much and how long for each) during or immediately following meeting (3-60 minutes)
8. Arrange next Project Status Meeting (1-3 minutes)

Minutes
1. Notes re: discussion and decisions.
2.
3.
4.

Actions
1. What, Who, When, Where, Why, How, How Long, How Much
2. Next Project Status Meeting
3.

Instructions for Use

TITLE BLOCK: 18 point Tahoma font "Project Status Meeting Agenda"

INFORMATION BLOCK:
1. Date: Date Agenda is delivered.
2. Meeting Date: Date of meeting. This is here to avoid confusion and is partly duplicative with the Meeting Information section below.
3. To: Note who the attendees will be. A "CC:" line can be added for non-attendees, if necessary.
4. From: Meeting Host. Usually the Project Coordinator.
5. Project: Project Name and PFCS Project Number
6. Regarding: "Project Status Meeting Agenda"
7. Attachments: Numbered list of attachments with the number of pages per document in parenthesis at the end "(2 pages)".
8. Note: Either the standard mediation admonition or any other note such as "Internal document. Do not distribute outside PFCS." Or the line can be eliminated if not used.

Meeting Information

1. Who: PM, Expert, Project Coordinator, Technical Lead
   A. List who is coming to the meeting and their roles on the Project Team. \
   B. This may be mostly duplicative with the "To:" in the Information Block.
2. When: Monthly (at the most)
   A. Date
   B. Time
   C. Duration
   D. This may be partly duplicative with the "To:" in the Information Block.
3. Where: In-office, via telephone conference, video conference, etc…
   A. Specify the location.
   B. If there is a technology solution make sure everyone knows how to joint in advance.
   C. If there is a conference call, make sure everyone knows the numbers, passwords, including the different numbers for the leaders and participants.
4. How Long: 7 minutes to 4 hours
   A. Try to keep is as concise as possible.
   B. Remember this session might need the time for the participants to really THINK. Our work is an intellectual, hypothesis based endeavor. If the answers were obvious our clients would not hire us. Do not rush through this CRITICAL step.
   C. Bill the time for the meeting to the Milestones, Deliverables and Actions that were identified and discussed in the meeting.
5. Roles: Leader, Timekeeper, Scribe
   A. Good meetings need to have 3 key roles: Leader, Timekeeper, and a Scribe (to take the notes and deliver minutes at the conclusion, if necessary.
   B. If possible, separate the roles and no one should have more than one role.

Agenda

1. One Minute Summary and Project Information Review (1-3 minutes)
    A. Project Coordinator and Technical Lead shall make sure the Project Information sheet, including the One Minute Summary are up to date before the meeting begins.
    B. Have this updated information available when the meeting begins, either on an overhead projector or printed for everyone.
    C. Begin the meeting by reading the One Minute Summary to the attendees to make sure everyone is on the same page. This may seem irritatingly tutorial, but it is a REALLY important "get everyone on the same page" activity.
2. Project Plan Review: Objective, Method, key Milestones & Deliverables, and key Actions to date (1-5 minutes)
    A. Project Coordinator and Technical Lead shall make sure the Project Plan up to date before the meeting begins, including all completed, in process and upcoming known Milestones and Deliverables, and all completed, in process and known upcoming Actions.
    B. Print or have accessible key Deliverables for review.
    C. Review the high-points of all these with everyone
    D. This is another REALLY important "get everyone on the same page" activity.
3. Old Business: Actions from previous meeting (0 minutes to 3 hours)
    A. Review the Actions and commitments from the previous meeting.
    B. Note completed and not complete Actions in the Minutes.
    C. Forward incomplete Actions to the Actions in this meeting, so that noting is forgotten. Note each item that is a carryover and the date from which it is being carried forward.
    D. **This is a REALLY important follow-up and follow-through mechanism. In fact, connection of the Actions from previous meetings to Old Business in the next meeting is probably the most important part of this process or of project management generally.**
4. Review Scope, Budget & Schedule compared to performance (2 minutes to 3 hours)
    A. What have we promised to do, by when and for how much?
    B. Are we clear about our scope, budget and schedule? Are we delivering as promised, within budget and schedule?
    C. One of the most common project management problems is "scope creep". Is that happening?
    D. Do we need to re-negotiate? Change orders?
5. New Business (0 minutes to 3 hours)
    A. This is where pre-meeting agenda items are discussed.
    B. This is where new business that is brought up during the meeting should be discussed and noted in the Minutes.
6. Brainstorming/Problem Solving/Team Consulting: Update Project Plan (2-60 minutes)
    A. Update as necessary using the applicable method and Menu of Deliverables
    B. Literally review the steps of the applicable Method and the Menu of Deliverables as a memory prompt.
    C. Brainstorm or Team Consult
    D. Update the plan as necessary.

7. Update Actions (what, who, when, where, how, how much and how long for each) during or immediately following meeting (3-60 minutes)
    A. This is where the detailed work of connecting Actions with Milestones and deliverables takes place.
    B. At this point we may realize that what we "want" to do is going to cost more than the project deserves. Some re-thinking or re-negotiating may be required as a result of this detailed planning.
    C. By identifying all actions, what the work will look like, who will do it, when it will be done, and how long it will take, we gain mastery over the work.
    D. By referring back to this analysis (detailing out the Actions) before the Project Status Meeting, and comparing performance to plan, we can then exercise dominion over the project.
8. Arrange next Project Status Meeting (1-3 minutes)
    A. Who needs to be in the next meeting?
    B. When, where, etc…
    C. Who will distribute the Meeting Minutes
    D. Who will compose the Meeting Agenda for the next meeting?

Minutes
1. Notes re: discussion and decisions.
2. Meeting Notes need not be beautiful, but they should be taken, be numbered consistent with the Agenda and saved to the file.
3. Meeting minutes need not be distributed for internal Project Planning Meetings
4. If it is a more formal meeting with outside attendees then Minutes should be distributed.

Actions
1. What, Who, When, Where, Why, How, How Long, How Much
2. Actions need to be SMART: Specific, Measurable, Action Oriented, Realistic, and Time Activated (have an estimated duration and a dead-line).
3. Next Project Status Meeting
4. **As noted also in the Old Business section: This is a REALLY important follow-up and follow-through mechanism. Connection of the Actions from previous meetings to Old Business in the next meeting is probably the most important part of this process or of project management generally.**
5. If the meeting is internal, consider sending a message to all attendees summarizing the Next Actions.
6. If the meeting is a Monthly Project Status Meeting, consider calendaring to re-send the list of Next Actions to all attendees mid-month as a reminder, so that people are less likely to miss commitments.
7. It will often be necessary to sit down and have a formal "Delegation" session that conforms with the One Minute Manager Meets the Monkey.

Weekly Plan

Date_____

#	Done	ABC	Milestones / Deliverables / Big Rocks	Time	Project	Notes
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
			Total Time			
			Discretionary Time (from your calendar)			
			Process			
		1	Values			
		2	Mission			
		3	Goals			
		4	Plans			
		5	Master Task List (MTL)			
		6	Hard Calendar			
		7	Discretionary Time			
		8	Milestones			
		9	Soft Calendar			
		10	Action			

Weekly Calendar

Date_____

Time	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
8:00						
9:00						
10:00						
11:00						
12:00						
						Sunday
1:00						
2:00						
3:00						
4:00						
5:00						
6:00						

Discretionary:	Discretionary:	Discretionary:	Discretionary:	Discretionary:	Discretionary:
Daily Tasks	Daily Tasks	Daily Tasks	Daily Tasks	Daily Tasks	Daily Tasks

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Project Plan Update #2

Date:	February 8, 2010
To:	Joe Peterson The Lofty Lawyer, PLLC 1415 SW Circus St, Suite 203 Portland, OR 97220 T: (503) 555-5555 E: joe@loftylawyer.com
From:	Pete Fowler Construction Services, Inc.
Project:	ABC Realty v. Awesome Construction PFCS Project No.10-100
Regarding:	Project Plan Update #2
Note:	Confidential Attorney-Client and Attorney Work Product. Protected under all applicable evidence codes.

Dear Mr. Peterson:

Per our telephone conversation on 2/6/10, the following is our third update to the project plan to reflect work performed and work we recommend moving forward. To date we have billed $6,913. Of this amount, Items C-E have been completed and Items A-B, F-I, K, and M are in-process. We request permission to continue the work on the in-process items. Items in Level 3 (N-R) will be performed as necessary. We anticipate the costs for work in Levels 1 and 2 to be $18,000-$22,000. We will notify you immediately if our budget changes for any activities.

Please note we strive to perform our work as quickly and efficiently as possible. If any of the items below are performed in a shorter time than estimated, you will only be billed for the time spent.

PFCS Analysis

Level 1 – Completed or In-Process Deliverables (Available on Client Access)
   A. <u>Meeting Minutes / Teleconferences/ Meeting Minutes</u>: Coordination of meetings including a site visit for a full day inspection, on-site meetings and telephone conferences with attorneys, contractors, and others. (In Process – 16-20 Hours)
   B. <u>Document Index/Summary</u>: Spreadsheet listing of all the documents we have received to date, including contracts, estimates, building plans, multiple punch lists, etc. This document is organized by title, author, date produced, and a brief 1-paragraph summary of the document. (In Process – 36 Hours)
   C. <u>Images and Information</u>: A document with general information, satellite and aerial images gathered from the internet. It will also have data such as square footage, number of bedrooms, year built, etc. (DONE – 3 Hours)
   D. <u>Issues List</u>: A summary and analysis of the issues as we understand them. This will be used as a checklist during our inspection. This included an update of the Issues List to include a thorough compilation of all issues observed during the PFCS site inspection. (DONE – 1 Hour)

E. Cost Analysis: A spreadsheet or document that briefly describes the costs, budget or estimated costs for a project. (DONE – 27 Hours)

F. Owner Photo Matrix and Analysis: Matrix owner's photographs that can be sorted with description and discussion for each photograph. (In Process – 24 Hours)

B. Level 2 – Recommended Deliverables (Available on Client Access as generated)

G. Unit Matrix: Spreadsheet with one row for each location and columns that include Line, Description (of the location), Details (like street, address), inspection location, testing location, "In-Scope" (to note locations where work by specific contractors took place), and many other possibilities. (In Process – 8 Hours)

H. Document Timeline: A spreadsheet that lists and summarizes selected documents and events in chronological order. (In Process – 8 Hours)

I. Document Summary: A document that first lists all the documents to be summarized, including very basic information like the title, author and number of approximate pages in the summary. (In Process – 16 Hours)

J. Project Summary Memo: One to three pages written, plus three to four pages of photographs or other graphical information. Report will include basic project summary, information we have, documents we have prepared, and an explanation of the issues being alleged but with no PFCS opinions. (N/A)

K. Issues-Discussion Matrix: This document will contain an outline of our opinion and discussion regarding each issue compiled from other expert reports and observed during our full day inspection. (In Process – 10 Hours)

L. Inspection Documentation: One complete day of inspection and meeting on-site accompanied by written field notes, photographs, sketches and diagrams. Processed electronic inspection documentation will be delivered to you via our Client Access System. (N/A)

M. Opinion Letter: 3-4 pages written plus 4-5 pages of inspection photographs with basic project information, summary of general inspection observations, discussion of issues, and recommendations going forward regarding plumbing issues at the residence. (In Process – 24 Hours)

C. Future/Trial Deliverables (Available on Client Access as generated)

N. Expert Deposition Preparation and Attendance: A structured preparation for delivery of opinions or facts in sworn testimony and attendance of deposition. (16 Hours)

O. Talking Points: A short list of key ideas, usually no more than 10, and are typically committed to memory. (16 Hours)

P. Trial / Arbitration Preparation: Like the deposition a structured preparation for delivery of opinions or facts in sworn testimony including exhibits and Trial Presentation referenced above. (24 Hours)

Q. Testimony Outline: This is specific for Expert Witness work and testimony in Federal Court. This has a complete table of contents. Sections, outline or information that might be included: Expert Qualifications, Overview of PFCS Services, General Project Information, Timeline of Events, Discussion Points and Analysis. (16 Hours)

R. Trial Presentation: A structured delivery of all information, including graphics, photographs, video, hand-outs or other visual aids, especially Power Point. (16 Hours)

ABC Realty v. Awesome Construction

PFCS Project Plan Budget

Line	Scope of Work / Deliverables	Status	Original Plan* Hours	Original Plan* Costs	Update 1** Hours	Update 1** Costs	Update 2*** Hours	Update 2*** Costs	Billed to Date	Cost to Complete
1	**Level 1: Completed or In-Process Deliverables**		**46**	**$ 4,540.00**	**76**	**$ 8,880.00**	**111**	**$ 12,487.00**	**$ 6,783.00**	
2	A. Meetings / Telephone Conferences / Meeting Minutes	Ongoing	16	$ 1,720.00	16	$ 1,720.00	20	$ 1,985.00	$ 646.00	$ 1,339.00
3	B. Document Index	Ongoing	16	$ 1,360.00	18	$ 1,360.00	36	$ 3,120.00	$ 2,820.50	$ 299.50
4	C. Images & Information (E-Data)	Done	2	$ 170.00	4	$ 340.00	3	$ 255.00	$ 229.50	$ 25.50
5	D. Issues List	Done	12	$ 1,290.00	2	$ 170.00	1	$ 42.00	$ 34.00	$ 8.00
6	E. Cost Analysis	Done	0	$ -	12	$ 1,290.00	27	$ 3,085.00	$ 2,923.00	$ 162.00
7	F. Owner Photo Matrix and Analysis	In-Process	0	$ -	24	$ 4,000.00	24	$ 4,000.00	$ 130.00	$ 3,870.00
8										
9	**Level 2: Recommended Deliverables**		**89**	**$ 9,725.00**	**54**	**$ 5,850.00**	**66**	**$ 7,350.00**	**$ 130.00**	
10	G. Unit Matrix	In-Process	8	$ 680.00	8	$ 680.00	8	$ 680.00	$ -	$ 680.00
11	H. Document Timeline	In-Process	8	$ 680.00	8	$ 680.00	8	$ 680.00	$ -	$ 680.00
12	I. Document Summary	In-Process	16	$ 2,080.00	16	$ 2,080.00	16	$ 2,080.00	$ -	$ 2,080.00
13	J. Project Summary Memo	N/A	10	$ 1,030.00	0	$ -	0	$ -	$ -	$ -
14	K. Issues-Discussion Matrix	In-Process	10	$ 1,210.00	10	$ 1,210.00	10	$ 1,210.00	$ 130.00	$ 1,080.00
15	L. Inspection Documentation (Photographs with Annotations)	N/A	25	$ 2,845.00	0	$ -	0	$ -	$ -	$ -
16	M. Opinion Letter	In-Process	12	$ 1,200.00	12	$ 1,200.00	24	$ 2,700.00	$ -	$ 2,700.00
17										
18	**Level 3: Future/Trial Deliverables**		**88**	**$ 13,050.00**	**88**	**$ 13,050.00**	**88**	**$ 13,050.00**	**$ -**	
19	N. Deposition Preparation	TBD	16	$ 2,240.00	16	$ 2,240.00	16	$ 2,240.00	$ -	$ 2,240.00
20	O. Talking Points	TBD	16	$ 2,420.00	16	$ 2,420.00	16	$ 2,420.00	$ -	$ 2,420.00
21	P. Trial / Arbitration Preparation	TBD	24	$ 5,040.00	24	$ 5,040.00	24	$ 5,040.00	$ -	$ 5,040.00
22	Q. Testimony Outline	TBD	16	$ 1,990.00	16	$ 1,990.00	16	$ 1,990.00	$ -	$ 1,990.00
23	R. Presentation	TBD	16	$ 1,360.00	16	$ 1,360.00	16	$ 1,360.00	$ -	$ 1,360.00
24										
25	**Total**			**$ 27,315.00**		**$ 27,780.00**		**$ 32,887.00**	**$ 6,913.00**	**$ 25,974.00**
26	* Budget dated 10/13/2009									
27	** Budget dated 1/13/2010									
28	*** Current budget									
29	TBD = To Be Determined									