# Rick Watts JD, PMP, PSEM

## **Enterprise Architecture & IT Expert**

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Quandary Peak Research Washington D.C.

quandarypeak.com/rick-watts

I am a seasoned professional with over 35 years of experience. I hold certifications as an Enterprise Architect, Project Management Professional, and Software Engineering Master. My technology background, which includes small strategic consulting assignments and massive enterprise implementations, enables me to give clients incisive advice on litigation.

Clients use my knowledge of software project planning and my history of achieving organizational goals to understand their cases quickly. By analyzing the specifics of a software dispute, I effectively explain the strengths and vulnerabilities of a client's technical arguments.

In addition to my core competencies, I possess expertise in litigation consulting and expert witness testimony. I have been involved in multiple litigation cases, providing valuable insights into enterprise architecture, software implementations, technical architecture design, project management, and system integrator delivery.

# **Technology Domain Experience**

#### IT Services

- Business Process Outsourcing
- IT Managed Services (Applications and Infrastructure Outsourcing)
- Commercial Off-the-Shelf (COTS) packaged software implementation
- · Data center selection, build, and vendor support services
- System Integrator and System Implementation Partner
- Commercial Request for Proposal and Vendor Selection
- Architecture Assessment
- IT Asset Valuations
- Merger & Acquisition Due Diligence

#### Governance

- Project, Program Management: Agile Scrum, Scrum of Scrum, Scaled Agile Framework (SAFe)
- · Project Management: Jira, Monday, MSFT Project, Planview
- Data Quality & Management: DAMA DMBOK2
- Architecture Frameworks: Zachman, TOGAF 9
- Security & Controls: NIST 500, NIST 800, COBIT, ISO 27001
- Business Continuity: ISO 22301, BSI 25999

#### **Data Management**

- Applications: Cellular provisioning and billing, Litigation Management, IT System Management, Analytics Platforms
- Data Warehouse Design & Deployment: Oracle OBIEE, Oracle Cloud, Google Big Query, Apache Hadoop, Snowflake

#### **Enterprise Business Systems**

- Enterprise Resource Management (ERM/ERP)
- Financials & Supply Chain (FSCM): PeopleSoft, Oracle EBS/Fusion, Microsoft Dynamics, SAP, Lawson, Workday
- Human Capital Management (HCM): PeopleSoft, Workday, Lawson, Microsoft Dynamics
- Customer/Supplier Relationship Management (CRM/SRM): Salesforce, Pega, Microsoft Dynamics
- · Service Management: Salesforce, ServiceNow
- Product Lifecycle Management (PLM): Siemens
- Governance, Risk & Compliance: RSA Archer, OneTrust
- Manufacturing/Industrial: SAP
- · City Management: SAP
- Real-Time Location Services (RTLS): CENTRAK
- Digital Asset Management and Digital Content Management Solutions
- Electronic Medical Record (EMR): Cerner
- · Digital Health Products: smart beds, nurse call, patient engagement

#### **Software Development**

- · Applications: Cellular provisioning and billing, Litigation Claims Management, IT System Management, Big Data
- · Languages: C, C#, Java, Python, R
- · Custom digital asset and content management solutions

## **Technology Platforms**

- · Cloud Infrastructure: Google, AWS, Azure, Oracle
- Databases: Oracle, SQL Server, MySQL, Postgres, Big Query, Snowflake, Exadata
- Virtualization: VMware, Cisco
- Interoperability: Boomi, MuleSoft
  Storage: Tintri, EMC, Dell
- · Networking: Cisco, Dell, Palo Alto

#### **EDUCATION**

JD, Juris Doctor of Law

Wake Forest University School of Law

BA, Public Administration, w/ minor MIS

Louisiana State University

#### **EXECUTIVE EDUCATION**

**Leading Digital Transformation in Health Care** 

Harvard Medical School

**Driving Digital Transformation** 

International Institute for Management Development (IMD)

**Leading Strategic Growth** 

Columbia Business School

**Managing Business Process Improvement** 

University of South Florida

**Cost Management & Analysis** 

American Management Association

#### **CERTIFICATIONS**

Certified Healthcare CIO (CHCIO-CHIME)

Certified Data Privacy Solutions Engineer (CDPSE-ISACA)

Professional Cloud Architect (Google)

Project Management Professional (PMP-PMI)

Professional Software Engineering Master (PSEM-IEEE)

Certified Enterprise Architect (EACOE)

Business Continuity Architect (RSA Archer)

Florida State Licensed Private Investigator (C 2900564)

#### **AFFILIATIONS**

College of Healthcare Management Executives (CHIME)

Project Management Institute (PMI)

Enterprise Architecture Center of Excellence (EACOE)

American Society of Industrial Security (ASIS)

Institute of Electrical and Electronics Engineers (IEEE)

Information Systems Audit and Control Association (ISACA)

Maryland State Bar Association

# **Employment History**

## **Enterprise Architecture & IT Expert**

Quandary Peak Research | Washington D.C. | 2024-Present

Expert witness and litigation consultant for failed software implementations and failed IT projects. Provides analysis and opinions in pre-litigation matters as well as active litigation; specializing in enterprise architecture, software implementations, technical architecture design and delivery, project management, including schedule delay and system integrator delivery.

## **Director Enterprise Architecture**

H Lee Moffitt Cancer Center | 2020-2023

IT Leader in Moffitt's Center for Digital Health, the Director, Enterprise Architecture is the senior level Architect leading a team of architects (directly and indirectly) to achieve the organization's goals. The primary role of the Director Enterprise Architecture is to ensure that the respective business, application, data, and technology strategies are in line with the organization's business goals, strategies, policies, and standards. Responsible for direct oversight of the Moffitt Technology Roadmap and is key advisor to the Center for Digital Health, including Health Data Science, Digital Innovation, and Information Technology.

- Establish Enterprise Architecture as a Center practice, aligned to TOGAF framework
- Create Business and Solution Architecture competencies
- Partner for Digital Innovation strategies encompassing AI/ML, CRM, Patient Personalization, Patient Experience
- Integrate Architecture into the portfolio and project process
- Key Technologies & Focus:
  - New Hospital Build Patient Smart Room and Interactive Patient Systems
  - Digital Multidisciplinary Tumor Boards
  - Patient centric CRM and Patient 360°
  - o Radiomics and Imaging Analytics

#### Senior VP Enterprise Architecture and IT Strategy

Aristocrat Technologies | 2018-2020

Global Head of IT Strategy and Architecture responsible for setting and socializing the strategy, vision, and roadmap for enterprise technologies to support Aristocrat's global business strategy. Change agent and champion for digital transformation, cloud-based microservices architecture and analytics-driven business decisions.

- Develop Enterprise Architecture as a corporate practice, integrate into all IT service management functions
- Align IT delivery to business objectives to ensure optimal value of IT to business
- Create 5-year strategic IT plan and roadmap to accomplish
- Interim executive leader of Project and Portfolio Mgmt., and Global Interoperability Teams
- Key Technologies & Focus:
  - Global analytics capabilities leveraging Google Cloud Platform
  - Digital transformation and functional journey to cloud using cloud adoption framework
  - Enterprise Master Data Management and Data Governance
  - Togaf 9 Enterprise Architecture Methodology

## **Litigation Consultant and Expert Witness**

DisputeSoft | 2009-2020

Expert witness and litigation consultant for failed software implementations and failed IT projects. Provided analysis and opinions in pre-litigation matters as well as active litigation; specializing in enterprise architecture, software implementations, technical architecture design and delivery, project management including schedule delay and system integrator delivery.

- Leading expert in five large software delivery litigation cases, all resolved in favor of client or agreeable settlement
- Pre-litigation opinions for four project management failure cases resolved favorably in mediation

#### **Chief Information Officer**

Howard University | 2016-2018

Executive IT leader for the University in all areas related to information technology, both for instructional and administrative applications. Directing the planning and implementation of enterprise IT systems in accordance with the mission, core values, and purposes of the University in support of faculty, staff and more than 10,000 students across 13 schools and colleges on a 64-building urban campus. Managing 200+ staff with annual spend of \$60M+, providing operations, compliance, and strategy.

- Plan, source, and implement strategic network managed service to replace and manage all network and telecom infrastructure with zero OpEx increase
- Reduce year-on-year OpEx by 12% through portfolio rationalization and contract renegotiation
- Create strategic roadmap for enterprise applications and infrastructure moving to hybrid cloud
- Transform IT organization and operations to be more transparent and accountable to the academic mission
- Key Technologies & Focus
  - o IT Operations optimization through service and work management tools
  - Managed services for hybrid and on-premises network and UCaaS
  - Infrastructure transformation using on-premises and hybrid cloud technology
  - o IT Governance based upon ITIL v3 ITSM model in a bi-modal IT operation
  - Information Security framework aligned to NIST 800 in a HIPAA, PCI and FERPA environment

# **Global Director Client Engagement/ Sr Architect**

Atos | 2012-2016

Global account executive responsible for framing strategic initiatives with client executives and aligning to the Atos service delivery portfolio. Program Executive for large, complex, multi-year strategic initiatives. Service portfolio from \$5M to \$150M.

- Program Executive, responsible for delivering digital transformation solutions to our key logo accounts across architecture, technology, and process
- Consulting CIO to cabinet or board, improving fiscal and operational performance within shared services IT
- Key Technologies & Focus:
  - Digital transformation using AI automation and automated workflow in energy and media industries
  - Robotic automation and business process analytics for Application Managed Services
  - Enterprise shared services architecture using ITIL v3

## **Enterprise Architect**

Sublimare Consulting, LLC | 2003-2005, 2009-2012

Executive technical advisor to the CxO suite responsible for designing, planning, and implementing enterprise-wide business systems to fully leverage application/technology portfolios to reduce costs, build resiliency and ensure corporate and regulatory compliance.

- Develop enterprise architecture frameworks and organizational practice alignment to those frameworks to ensure compliance for a \$3bn merger
- Design business solutions to fully leverage application/technology portfolios to reduce costs, build resiliency and ensure corporate and regulatory compliance for large multinational corporations
- Key Technologies & Focus:
  - Business Continuity Management aligned to ISO 22301 standards with CMDB and enterprise GRC
  - Enterprise security provisioning and rights management per COBIT v3, ISO 27001
  - o Global data center outsourcing and in-sourcing with business applications rationalization
  - o IT portfolio valuation from business goals to technology and infrastructure deployment

## **Director, Oracle Technology Services**

Capgemini | 2005-2008

Member of the practice leadership and a leader for the Oracle National Alliance, responsible for creating new delivery services in the Oracle Fusion space that complimented BPM and SOA business initiatives in North America and Europe.

- Develop SOA business solutions for architecture, business process and technical integration for a \$38M portfolio
- Advise ERP clients on enterprise architecture and IT governance, IT strategy and application outsourcing strategy
- Key Technologies & Focus:
  - o Enterprise IT governance using ITIL v2 and COBIT 4
  - Business to technology alignment using Zachman enterprise business architecture framework
  - Infrastructure plans and IT service portfolios to support technology and business process outsourcing
  - o Enterprise master data management (MDM) and IT Governance

## **Director, Technology Service Delivery**

Hackett Group (FKA Answerthink) | 2001–2003

Leader of technology resources within a Business Applications practice, creating technology product and service portfolios then managing development of each into revenue streams.

- Provide client IT architecture and infrastructure strategies, including system and process analysis and design
- Technology liaison to client business leadership for enterprise systems operations and business practices
- Establish technical architecture services and architecture assessment methodology within practice
- Key Technologies & Focus:
  - o Enterprise technical architecture and performance management
  - PeopleSoft and Oracle ERP/CRM/HCM architecture, design and deployment
  - Enterprise solutions governance using COBIT 3 and ITIL v2

## Manager, Technology & Architecture

Information Management Associates, Inc | 1991–2001

Application architecture and infrastructure consultant; responsible for designing and deploying enterprise solutions, including PeopleSoft and Oracle ERP/FSCM/CRM/SRM systems, BI solutions, and data warehouses.

- Enterprise Applications governance aligned to ITIL practices
- PeopleSoft, Oracle Apps/database and EMC storage technical expert
- Data warehouse design and implementation using Inmon model and Oracle best practices
- ERM solution architect, PeopleSoft FSCM, HCM, SRM, CRM; Oracle Financials and OBIEE
- Large and complex systems optimization, open systems performance expert
- Provide client IT architecture and infrastructure strategies, including system and process analysis and design
- Technology liaison to client business leadership for enterprise systems operations and business practices

# **Technical Due Diligence & Audits**

Lenskart Solutions | Startup M&A | Apr 2025
 Technology: Extended Reality (XR), Augmented Reality (AR), Mixed Reality (MR).

• ECRS Software Corporation Technical Audit & Assessment | Sept 2024-Feb 2025

Counsel: Wilson Elser Moskowitz Edelman & Dicker LLP

Nature of Consultation: Software Analysis

Technology: E-Commerce, Synchronization, Software Reliability

# **Litigation Consulting**

Chase Global Services v. Protech Solutions Inc. | July 2025-Present

Jurisdiction: AR Civil Division, Circuit Court of Pulaski County

Case Number: 60-cv-19-739 Counsel: McDaniel Wolff PLLC Nature of Suit: Trade Secret

· Qualia Labs, Inc. v. Settlor, Inc.; Land Title Guarantee Company; et al. | July 2025-Present

Jurisdiction: US District Court, District of Colorado

Case Number: 1:24-cv-00133 Counsel: Greenberg Traurig, LLP

Nature of Suit: Trade Secret, Breach of Contract

· Coupa Software Inc. and LLamasoft LLC v. Optilogic, Inc., et al. | June 2025-Present

Jurisdiction: US District Court, District of Delaware

Case Number: 1:24-cv-01275

Counsel: eliteXprts Nature of Suit: Copyright

## • Dr. Edwin A. Hernandez and ELGA Corp. v. Stingray Group Inc., Mood Media, et al. | May 2025-Present

Jurisdiction: US District Court, Southern District of Florida

Case Number: 1:24-cv-21226

Counsel: Sterne, Kessler, Goldstein & Fox PLLC

Nature of Suit: Trade Secrets

Technology: Digital music streaming and content distribution.

#### · I.A.T.S.E. National Health & Welfare Fund v.

#### Avenu Insights & Analytics LLC, and CPAS Systems Inc. | Mar 2025-Present

Jurisdiction: Supreme Court of NY, New York County

Case Number: 650787/2024 Counsel: DLA Piper LLP

Nature of Suit: Breach-of-Contract Technology: Pension Fund System

### · Valtrus Innovations and Key Patent Innovations v. SAP America, Inc. and SAP, SE. | Feb 2025-Present

Jurisdiction: US District Court for the Eastern District of Texas

Case Number: 2:24-cv-00021

Counsel: Reichman Jorgensen Lehman & Feldberg LLP

Nature of Suit: Patent

Technology: ERP Software, Database

## • Marriott Vacation World v. Infosys LLC | Nov 2024-May 2025

Jurisdiction: Judicial Arbitration and Mediation Services (JAMS)

Counsel: Benesch, Friedlander, Coplan & Aronoff LLP Nature of Suit: IT Managed Services, Breach of Contract

Technology: IT Managed Services

#### • King & Spalding LLP, Confidential Consulting | Oct 2024-Present

Nature of Consultation: Class Action Litigation

Technology: Consumer Reporting, Software Management

### • Pioneer Hotel Group, Inc. and Pinal Doshi v. Choice Hotels International, Inc | Sept 2024-Present

Jurisdiction: Fourth Judicial District of ID, Ada County

Case Number: CV01-23-04099

Counsel: Mooney Wieland Warren PLLC Nature of Suit: Breach-of-Contract

Technology: Authenticating Digital Signatures, GeoLocation

### • Confidential Customer v. Confidential Vendor | Sept 2024-Present

Jurisdiction: American Arbitration Association

Counsel: Wilson Elser Moskowitz Edelman & Dicker LLP

Nature of Matter: Software Implementation Dispute, Breach of Contract Technology: ERP Software, Entitlement Management, B2C Portals

#### Ivan Laguna and Margarita Lopez v.

#### Lazer Safe, Pty, Ltd., Fiessler Electronik Gmbh & CO., Ermak USA, Inc | Sept 2024-Present

Jurisdiction: US District Court for the District of Massachusetts

Case Number: 3:23-cv-30016 Counsel: Sullivan & Sullivan, LLP

Nature of Suit: Personal Injury, Specific Jurisdiction

Technology: IP GeoLocation

#### • ECRS Software Corporation Technical Audit & Assessment | Sept 2024–Feb 2025

Counsel: Wilson Elser Moskowitz Edelman & Dicker LLP

Nature of Consultation: Software Change Failure

Technology: E-Commerce, Synchronization, Software Reliability

## • <u>iPro, Inc</u> v. Flagler Hospital, Inc | Aug 2024–Oct 2024

Jurisdiction: Seventh Judicial Circuit of FL, St. Johns County

Case Number: CA22-1559 Counsel: The Minor Firm

Nature of Suit: Software Dispute, Breach-of-Contract

Technology: Medical Order Entry System

## · Covid Testing Today, NRJY Inc v.

## Flow Health Laboratories, LLC, and Signal Diagnostics, LLC | July 2024-Present

Jurisdiction: JAMS Arbitration Case Number: 5210000247 Counsel: Hochfelsen & Kani

Nature of Suit: Arbitration, Breach-of-Contract Technology: Medical Information Integration

#### FTC in re H&R Block | July 2024-Oct 2024

Jurisdiction: Federal Trade Commission

Case Number: Docket 9427

Nature of Matter: Consumer Protection Online Application Technology: Complex Web Services, Software Design

#### • Confidential Customer v. Confidential Vendor | Jul 2024-Sep 2024

Jurisdiction: Judicial Arbitration and Mediation Services (JAMS)

Counsel: Stinson LLP

Nature of Suite: Software Implementation Dispute, Breach of Contract

Technology: ERP Software

## • Richard Chance v. Totem Technologies, Inc | June 2024–Nov 2024

Jurisdiction: State of OK, District Court of Tulsa County

Case Number: CJ-2023-02533 Counsel: Actuate Law, LLC Nature of Suit: Trade Secret

Technology: Digital Cloud Code Repositories

### • Vimo Inc d/b/a GetInsured v. Deloitte Consulting LLP | May 2024-Mar 2025

Jurisdiction: Superior Court of CA, County of Santa Clara

Case Number: G-24-7-NA, 22-cv-405262

Counsel: Kirkland & Ellis LLP

Nature of Suit: Trade Secret, Breach of Contract

Technology: Software Development, Health Insurance Exchange

## · Iconic Hearts Holdings, Inc v. Raj Vir; NGL Labs LLC; Joao Figueiredo; Hunter Isaacson; et al. | Apr

2024-May 2024

Jurisdiction: Superior Court CA, County Of Los Angeles

Case Number: 22STCV21509

Counsel: Bryan Cave Leighton Paisner, LLP Nature of Suit: Trade Secret, Breach-of-Contract

Technology: Online Games

#### • Hidden Empire Holdings, LLC v. <u>Darrick Angelone</u> | Feb 2024-Present

Jurisdiction: US District Court, Central District of California

Case Number: 2:22-cv-06515 Counsel: Kramer DeBoer & Keane

Nature of Suit: Injunction Violation, Breach of Contract

**Technology: Cloud Applications** 

### • Oriental Trading Company LLC v. Denovo Ventures LLC | Jan 2024 – Jan 2025

Jurisdiction: District Court of Douglas County, Nebraska

Case Number: CI 2206047

Counsel: Gordon Rees Scully Mansukhani, LLP

Nature of Suit: Copyright, Software Implementation Dispute, Breach of Contract

Technology: ERP Software

#### • City of Goodyear v. Berry Dunn | 2016

In an arbitration regarding alleged failure of a for-hire project management firm to properly manage requirements, system integrator (SI) vendor selection and project delivery of a city-wide SAP ERP project. Conducted analysis of requirements documentation, SI vendor RFP and selection as well as project management artifacts to establish opinions that the defendant had failed to follow industry standards for requirements gathering, lacked expertise to select a vendor and manage an SAP project, did not use industry standards for project management. Case settled.

#### • Kemper Corporate Services, Inc v. Computer Sciences Corporation | 2016

In an arbitration regarding the failed implementation of a property and casualty insurance system that was allegedly never made "generally available," conducted a code quality analysis of source code translated from COBOL to Java using industry standard code analysis software and rules databases. Compared performance testing data from single user testing, volume testing, stress testing, and batch testing to legacy system benchmarks and established test plans. Examined release documentation for evidence of independent quality control testing. Case settled.

#### Orange County, CA v. Tata Consulting Services | 2016

In this breach of contract and fraudulent misrepresentation case in connection with the implementation of a new property tax management system. Examined process documents, architectural documents, testing documents, source code, defect reports, and IBM Rational and Microsoft Team Foundation Server systems. Reached opinions that Tata failed to develop PTMS using an "n-tier" architecture in accordance with its RFP response and design documents, deviated from its established software development processes, and misrepresented the extent to which unit and system testing had been completed during the project. Drafted expert and rebuttal reports. Assisted with identification of exhibits for trial. Consulting expert. Case settled.

## · City of Goodyear v. Quintel Management Consulting | 2015

In a breach of contract case involving the implementation of an SAP ERP system for city-wide services management. Conducted analysis of RFP responses, project artifacts and software final delivery to determine if defendant's representations regarding software being fit for purpose and would meet requirements with out of the box functionality were accurate and whether software as delivered was standard or customized leaving major cost and supportability issues. Reviewed project artifacts and testing results to determine if software as delivered satisfied contractual requirements. Case settled.

#### • 3M v. State of Connecticut | 2015

In an arbitration in which plaintiff was seeking payment for delivery of a state-wide integrated vehicle management system, the defendant contended that the software requirements had not been met. Conducted analysis of Microsoft's independent audit and application assessment in order to refute the results generated by the Microsoft Code Analysis Tool .NET (CAT.NET) which indicated certain security and code complexity requirements had not been met. Verbal report. Case settled.

#### • CGI v. eHealth Ontario | 2015

In this breach of contract case alleging wrongful termination for default of a contract to deliver a Chronic Disease Management System Diabetes Registry (CDMS-DR). Conducted analysis of documents and defect resolution tracking data to validate plaintiff's claims of delivery completion and establish that defendant impeded plaintiff's ability to deliver the project on schedule. Rebutted defendant's experts' claims that plaintiff failed to meet the contractual specifications and violated project management and software engineering standards causing delay and justifying defendant's termination of the contract. Parties agreed to a special arbitration wherein the plaintiff was awarded nearly \$27 million CAD.

- ACADEMY, LTD d/b/a ACADEMY SPORTS + OUTDOORS v. Wipro Limited and Wipro Inc | 2015
  In a breach of contract case involving the implementation of an Oracle Retail Merchandising System for a
  sporting goods retailer. Examined project management materials and process, architecture, and
  technical requirements as well as vendor roles in project delivery and key contractual deliverables.
  Reached opinions that the vendor failed to properly manage the project, deliver key personnel, and
  comply with contractual requirements for project delivery. Case settled.
- 3M v. Commonwealth of Kentucky | 2014

In an arbitration in which plaintiff was seeking payment for delivery of a state-wide integrated vehicle management system, the defendant contended that the software requirements had not been met. Conducted analysis of Microsoft's independent audit and application assessment in order to refute the results generated by the Microsoft Code Analysis Tool .NET (CAT.NET) which indicated certain security and code complexity requirements had not been met. Case settled.

• CedarCrestone, Inc v. Affiliated Computer Services, LLC n/k/a Xerox Business Services | 2013 A software failure matter brought by a consulting and systems integration vendor against a Business Process Outsourcing (BPO) provider. Rebutted plaintiff's expert's opinions that project management failures and schedule delay allegedly caused by defendant impeded plaintiff's ability to attain critical project milestones. Proffered additional opinions that plaintiff's violations of project management and software engineering industry standards resulted in software defects that should have surfaced in plaintiff's developer testing, and which ultimately caused the failure of the overall BPO program. The plaintiff was subcontracted to provide a PeopleSoft upgrade forming the foundational system for the BPO. Established that the plaintiff's failure to successfully deliver the upgrade by the scheduled go-live date precluded the defendant's ability to go-live with the BPO, resulting in multi-million-dollar penalties and other consequential damages to the defendant. Case settled.

## • Brookings v. CedarCrestone, Inc | 2010

In an IT project implementation failure case alleging the system integrator failed in deploying a PeopleSoft ERM grants system. Provided root cause analysis for project failure, focusing on the ISV role of the vendor in managing a project to delivery as well as actions by the plaintiff that contributed to the project failure. Opinions were core to the settlement of the suit. Case settled.