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Signature Property Management
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SAMPLE PREFACE OF REPORT TO THE COURT

**Xxxxxx Insurance Company as assignee of xxxxxx and xxxxxx v. xxxxxx Corporation
doing business as the Chase Park Plaza Royal Sonesta and David Kohlasch
United States District Court for the Eastern District of Missouri Case No. xxxxxxxxxxxx**

July 23, 2020

1. Preface

Xxxxxx LLP retained my services to evaluate whether xxxxxxxx Corporation (“xxxxxx”) and employees xxxxxxxx (“xxxxxx”), xxxxxxxx (“xxxxxx”), and xxzxxxxx (“xxxxxx”) complied with the applicable property management standards of care when maintaining the Unit xxxzx terrace roof drain at the xxxxxxxx Residences, xxxxxxxxxxxxxxxxi. I reviewed and considered the pleadings, documents produced during discovery, deposition testimony (including exhibits), the Dr. xxxxxx report, and the xxxxxx report when formulating my opinions.¹ I base my findings and opinions on the documents reviewed along with my knowledge, training, education, and extensive experience in the association/condominium property management industry. I have reached all opinions to a reasonable degree of professional certainty.

2. General Overview

xxxxxx, the Director of Engineering, began working at the xxxxxx property in 2004. Building Engineer xxxxxxxx (“xxxxxx”) began working at the building in 2007. Xxxxxxx began working at the property in 2013. xxxxxxx entered into a Management Agreement with xxxxxxx Inc. (“xxxxxx”) effective June 2, 2017, to run the property. xxxxxxx appointed xxxxxxx as the property’s General Manager (“GM”).

xxxxxx cleaned the Private Residences terrace drains on a monthly basis. When xxxxx left xxxxxxx in August 2017, xxxxxxx, xxxxxxx, and xxxxx in violation of industry custom and practice, failed to take reasonable and appropriate steps to ensure the continued inspection and cleaning of the terrace drains. Plant material and other debris accumulated on the Unit xxxxx terrace roof after

xxxxxx left xxxxxxx, and during a moderate rain event on February 24, 2018, debris blocked the terrace drain allowing accumulated water to fill the terrace roof. Water overflowed from the terrace roof and infiltrated the xxxxx condominium below causing substantial damage in excess of \$1,600,000.00.