

EXHIBIT

R

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

STATE OF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

NORTH REGION CONSTRUCTION

PO BOX 699

GARBERVILLE CA 95542

PHONE (707) 925-6218

FAX (707) 925-6391

CC: JC, HDM, RM

JOBSITE (J. Ham, J. Cartwright)

Flex your power!
Be energy efficient!

Date: 07/03/07

285 fig 8.0

285 fig 14.13

Contract: 01-397514

285 fig 18.1

MEN-101-KP 159.6/162.0

REALIGN ROADWAY - CONFUSION HILL

Mr. Evan Paine

MCM Construction, Inc.

PO Box 620

North Highlands, CA 95660

RE: SWPPP Amend#8&#9 – Letter#109

Faxed: (916) 334-0562 and mailed

Evan:

As previously stated verbally on June 14, 2007; your submitted SWPPP amendments #8 and #9, dated 6/12/07 and 6/14/07, respectively, have been approved. Attached for your records are copies of the Resident Engineer's approval sheets.

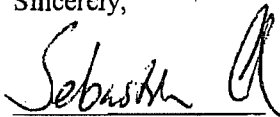
Additionally, it is acknowledged that MCM has submitted Form CEM-6201A for NOPC #13, requesting reimbursement for inefficiencies experienced for implementing various BMPs. Although, the inefficiencies from the work necessary to minimize impacts for the various operations is apparent, it is Caltrans' position that the measures that are being requested are not extra work and will not be reimbursed via a Change Order. Our position is that such measures necessary to minimize the impacts, via containment, are inclusive in the cost / reimbursement of the specific item of work that causes the waste product.

Your stated position that all impacts as a result of the work of the project, which are necessary to construct the project, are permitted, without any containment measures in place, is not concurred with. It is necessary and expected that measures to minimize impacts prior to causing the said impact is what is expected from the language in the permits. The idea of allowing welding slag and sandblasting waste to deposit freely without containment measures, and then be cleaned from the river bar after construction is complete, is not what Caltrans and the permitting agencies consider to be an acceptable practice. Minimization prior to the causation of the deposition of waste and maximization of containment are the key components in a majority of BMPs, regardless of the waste product; the construction operation; or the specific BMP. I believe that you will find this to be true and respected as an industry standard practice for most projects in environmentally sensitive areas, of which our project site most definitely is.

With that said, since the implementation of the BMPs for welding slag and sandblasting containment, the impacts from your operations have substantially decreased. Your staff appears to have been informed of proper containment methods and is active at pursuing compliance. Caltrans is hopeful that this effort keeps up and that we do not return to a condition where Caltrans is having to constantly remind and force the contractor to implement BMPs that are either required by the approved SWPPP or otherwise necessary to provide the necessary containment measures.

Please give me a call so we can discuss the options and necessity of the road.
Office:(707) 925-6217 Cell: (707) 496-4096.

Sincerely,



SEBASTIAN COHEN
Resident Engineer

cc: Project Records 5.5
MCM/JHam
NRCO
TDavis
DStiles
DThomas

EXHIBIT S

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

285 file 10.1

MERCER-FRASER COMPANY

General Contractors and Engineers
Since 1870

P.O. Box 1006, Eureka, CA 95502-1006
(707) 443-6371 Fax (707) 443-0277

May 8, 2008

MCM Construction, Inc.
Attn: Evan Paine
P.O. Box 620
North Highlands, CA 95660

Fax (916) 334-0562

Reference: Contract 01-397514, Confusion Hill

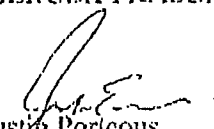
Subject: Backcharge Protest

Dear Mr. Paine,

Reference my letter dated April 17, 2008 and MCM's letter dated May 5, 2008. This correspondence is in protest to backcharges #189, 191 & 192. As explained in my April 17 letter, Mercer-Fraser Company will dispose of drill spoils from the Contractor's stockpile. We have always had men and equipment ready and on site to remove the drill spoils but your superintendent insisted that MCM would perform the spoils removal and backcharge Mercer-Fraser Company. We cannot be held financially responsible for your efforts to remove the spoils when your company would not let us perform. Additionally, per our subcontract, MCM owes Mercer-Fraser Company our contract price for all spoils removal, regardless of who performed the work. We consider the backcharges a violation of our subcontract.

Please call me at (707) 599-6365 if you have any questions.

Sincerely,
MERCER-FRASER COMPANY


Justin Porleous
Engineer

cc: Job File

EXHIBIT T

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
INITIAL NOTICE OF POTENTIAL CLAIM
CEM-6201A (NEW 9/2002)

FOR STATE USE ONLY	
Received By	Date
(For Resident Engineer)	
TO	CONTRACT NUMBER
Sebastian Cohen (Resident Engineer)	01-397514
DATE	IDENTIFICATION #
June 13, 2007	NOPC #13

This is An initial Notice of Potential Claim for additional compensation submitted as required under the provisions of Section 9-1.04, "Notice of Potential Claim", of the Standard Specifications.
The act of the Engineer, or his/her failure to act, or the event, thing, occurrence, or other cause giving rise to the potential claim occurred on

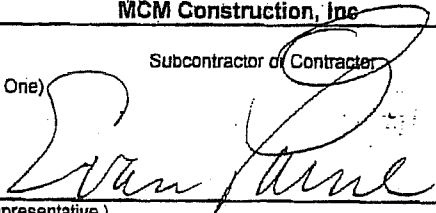
DATE June 12, 2007

The particular nature and circumstances of this potential claim are described as follows:

Caltrans is directing additional SWPPP above and beyond the scope of the contract. While there are various circumstances and events leading up to this claim, the most notable as of late is the direction for additional containment for sandblasting and welding. However, there has been some reference by Caltrans that there will be a forthcoming CCO 26 for the Pier 3 pour delay that occurred over a month ago on May 2, 2007, but this CCO has yet to be issued. The direction not to pour was clearly additional SWPPP direction from Caltrans that is not consistent with the Contract.

Reference MCM letter dated June 13, 2007.

The undersigned originator (Contractor or Subcontractor as appropriate) certifies that the above statements and attached documents made in full cognizance of the California False Claim Act, Government Code sections 12650 - 12655. The undersigned further understands and agrees that this potential claim to be further considered unless resolved, must fully conform to the requirements in Section 9-1.04 of the Standard Specifications and must be restated as a claim in the Contractor's written statement in conformance with Section 9-1.07B of the Standard Specifications.

MCM Construction, Inc.
Subcontractor of Contractor
(Circle One)

(Authorized Representative)

For subcontractor notice of potential claim

This notice of potential claim is acknowledged and forwarded by

MCM CONSTRUCTION, INC.
PRIME CONTRACTOR

(Authorized Representative)

CEM-6201A (NEW 9/2002)

EXHIBIT U

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

DEPARTMENT OF TRANSPORTATION

NORTH REGION CONSTRUCTION

PO BOX 699

GARBERVILLE CA 95542

PHONE (707) 925-6218

FAX (707) 925-6391

*Flex your power!
Be energy efficient!*

Date: 04/02/09

Contract: 01-397514

MEN-101-KP 159.6/162.0

REALIGN ROADWAY - CONFUSION HILL

Mr. Evan Paine
MCM Construction, Inc.
PO Box 620
North Highlands, CA 95660

RE: Bridge Finish - Letter#140

Faxed: (916) 334-0562 & mailed

Gentlemen:

As indicated in your last correspondence, dated March 17, 2009, your current plan to perform the necessary concrete finish work for Bridge No. 10-299 (South Bridge), such that the Contract Specifications are met and the appropriate appearance is achieved, is to provide access to the structure surfaces via a "snooper" style piece of equipment and conduct whip blasting operations. Although there are generally several methods for acquiring access and performing this type of work, the proposed method is considered to be a proven industry standard practice for achieving the required surface appearance. Per your Letter, the snooper will provide adequate and safe access, but will have limited load capacity, creating a situation where containment measures and a subsequent build-up of sandblasting waste material are limited.

It is understood that MCM has concerns about being able to perform the whip blasting operations efficiently and safely, and still contain large amounts of sandblasting waste. As indicated during other discussions, MCM feels that permitting agencies will interpret the existing permits as requiring complete and total containment of sandblasting waste, and will create a situation where containment costs become extreme. Specifically, MCM feels that the cost-effectiveness and/or the feasibility of BMPs are not taken into account.

As the finish work being planned is a standard practice in bridge building, the Department feels that performing this work is an activity that is covered in the approved Permits, and that development of BMPs that utilize common and standard methods or techniques are appropriate and expected by the agencies, and are therefore expected and required by the Department.

The fact that other projects at other locations around the State have implemented other BMPs, or in some cases, no BMPs, for similar types of operations, is not specifically relevant to this project and its approved Permit(s). There are several factors, including permit language, experience of personnel, type of waste product, etc... which may have been different for the other projects. For this project, and for projects in our specific region, BMPs for sandblasting operations are considered standard and are consistently required and implemented, as has been required for other sandblasting operations on this project.

The BMP must comply with the overall methodologies as described in the SWPPP document, and indicate what actions will be taken for the operation(s) being performed. The term Best Available Technology Economically Feasible, which is commonly referred to as BAT, is the standard that the BMP must meet. The position that every last grain of sand must be contained, or the permits are considered violated, is not a correct one. The agencies are aware that sandblasting operations are necessary on our projects, but they do consider the implementation of a BMP as a requirement.

Cost-prohibitiveness and feasibility are factors that are taken into account when dealing with impacts from construction activities and development of appropriate BMPs. The practicality of the BMP is a consideration. However, as has been stated many times before, not implementing and maintaining a BMP, simply because 100% of the waste material is not capable of being captured, or the fact that the BMP causes some inefficiencies to the contractor's operations, is not appropriate or acceptable, and would be considered a violation of the Permit.

Per the Department's interpretation, the Permits require that for any project activity, an appropriate BMP be developed; approved by the Engineer; included in the Project's SWPPP; and lastly must be implemented and maintained. The obvious first goal of any BMP is to prevent any impacts, if possible, and then to subsequently minimize any other non-preventable impacts. As has been discussed and described several times through the life of this project, requirements for BMPs are that they be effective to the maximum extent practical, not to the maximum extent possible.

Based on previous discussions, the main points that should be developed and conveyed in a BMP for the finish work are in the below bullets. Per the SWPPP, as required for previous sandblasting operations, a general or typical diagram with appropriate text describing what measures will be performed, with an appropriate section explaining the details of the BMP, is what is considered to be a minimum requirement. This document is considered to be an amendment to the SWPPP, and is appropriate to illustrate that Permit compliance is being taken seriously, and that the work being performed is in compliance with the SWPPP, and therefore in compliance with the Permits.

BMP Details Previously Discussed (provided for your consideration):

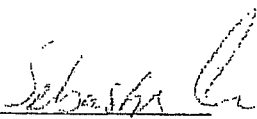
- Use of non-toxic materials. Note that if toxic materials are used in any type of work, the level of containment expected by all permitting agencies is drastically increased. When non-toxic materials are utilized, any justification and/or defensive position regarding potential impacts is substantially improved.
- Angling the nozzle to limit overspray, when possible. It is acknowledged that this is rather difficult, given the realistic need to angle the nozzle away from the person performing the whip blasting. Regardless, there are some situations where additional containment could be achieved via paying attention to the locations where overspray is being directed.

- Placing both or either horizontal and vertical barriers (filter fabric, visquine, plywood, etc....), when applicable, on the bridge or on the ground below, to first prevent and then subsequently to capture as much overspray as possible.
- Limit the work during high wind events, such that downwind migration of overspray material is minimized.

In general, as long as a practical BMP is developed; approved; implemented and maintained, The Department is confident that Permit compliance will be achieved.

As this work is planned to begin soon, the Department will perform a rapid review and return of the BMP after it is submitted. If you have any questions or comments, please give me a call.

Sincerely,


SEBASTIAN COHEN
Resident Engineer

cc: Project Records Cat 5,
DStiles

EXHIBIT

V

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

**LADD AND ASSOCIATES GENERAL ENGINEERING CONTRACTOR**

P.O. BOX 992750

REDDING, CA 96099-2750

530-241-6102

FAX 241-5492

**NOV 9 2006**

Mercer Frasier
P.O. Box 1006
Eureka, Ca 95502

Re: 01-Men-101-159.6/162.0
Contract 01-397514
Confusion Hill 101 Realignment

Re: Your letter of 11-09-06, regarding SWPPP issues

Attn: Justin Porteous, Mercer Frasier Project Engineer

Gentlemen:

In your letter of 11-09-06, you are specifically directing us to perform SWPPP operations. As you are aware, during bid time we submitted a sub-quotation to you that specifically included a price for SWPPP for our operations only (see attached bid proposal). ~~Your company removed that item and other related SWPPP items of work from our scope of work at the writing of our subcontract (see attached final subcontract scope of work)~~ and said that they would take care of all SWPPP on the project. Now you are telling us to take care of SWPPP issues that apply to our operations. This falls under your scope of work not ours. We had anticipated all weather operations and the resultant SWPPP required in our original quotation but it was removed from our scope.

We fully intend to cooperate and coordinate our operations with you so that the SWPPP impacts can be kept to a minimum. In regard to Issue #13 the areas involved are still active not idle. We are, as you know, trying to get the access established, excavating for the pier #2 and abutment #1, and stabilize the slide that occurred. All these activities involve stockpiling in the area mentioned and the area will remain being disturbed until these operations are completed. These are all contract items or required items of work that the SWPPP falls under your scope of work. The idea of a settlement basin might work as a temp bmp as well as silt fencing. When the access and the excavations are completed then temporary erosion control can be applied. The disturbed area here is 4.25 acres (1.72-hectares) well within the specifications. Issue #14 can be satisfied if the area around the Pier#3 South Bridge (Oak Tree) has temporary erosion control applied to it. Issue #18 involves MCM not Ladd, we had no involvement in the work platform work.

In regards to the Clearing and Grubbing operations, under Section 10-1.01, Order of Work, of the Contract Special Provisions, regarding work windows for cutting vegetation and performing clearing and grubbing operations, it states: "All trees and brush shall only be cut down from September 1st to February 1st of any year. This work window falls in the rainy season. Your statement that you did not anticipate clearing and grubbing operations in the rainy season is contrary to the specifications. Our

plan this year was to fall all the trees to get them on the ground so bird nesting could not take place. Also, to possibly clear enough of the upper cut areas to access the perimeter ditches for construction next year and to get access to Abt #4 of the South Bridge.

We are only trying to accomplish the work. We will minimize the impacts as much as possible and within specifications.

Sincerely,


Mark Christopher, Sr. Vice Pres

EXHIBIT W

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

285 Hi 6 / 10.1

MERCER-FRASER COMPANY

General Contractors and Engineers

Since 1870

P.O. Box 1006, Eureka, CA 95502-1006

(707) 443-6371 Fax (707) 443-0277

August 29, 2006

MCM Construction
6413 32nd Street
North Highlands, CA 95660

CC: James H. 8/30/06
707 925 6096

Reference: Contract 01-397514

Subject: SWPPP Considerations

Dear Mr. Paine,

Sent Dewater
Plan 8/31/06 ep

The Resident Engineer asked me, as the contractor's designated Water Pollution Control Manager, to attend a meeting concerning SWPPP issues this morning. I attended the meeting with the expectation that you, James Hamm, or other representation of MCM would be in attendance. Apparently, the State did not invite MCM personnel to the meeting with the understanding that I would represent the interests of your company; which I endeavor to do. I made a list of the points discussed, which I will itemize in this correspondence, but made no obligations on the part of MCM Construction or subcontractors. The following bulleted items comprise the key points discussed.

- The State exhibited frustration with MCM's cooperation with "house keeping" BMPs. Several State personnel (biologists, structures, inspectors, etc.) voiced concerns that MCM personnel have refused to employ appropriate BMPs when they point out what they believe are BMP deficiencies. Specifically, the State has photographs of minor equipment leaks and spills and produced photographs of spent welding rods on the gravel bar and areas surrounding the current trestle construction. In fact, they believe many used welding rods were discharged deliberately to contradict the wishes of the various State employees. The RE is concerned that MCM is not putting forth enough effort to appear in compliance with the various governing environmental permits and will attract undue attention to the project. They discussed when and under what conditions to issue a Stop Order if MCM fails to come into SWPPP compliance. No discussions of what specific actions MCM will need to take to avoid a Stop Order took place other than maintain a cleaner work site.

My opinions are twofold: 1) daily SWPPP compliance issues should be brought to the contractor's attention from the inspectors and not from various other State employees, and 2) more visible house keeping BMPs (buckets for used welding rod, trash bins, removal of contaminated soil) would go a long way to relieving the heat from the whole SWPPP issue.

- Section 10-1.02 Water Pollution Control, Pile & Cofferdam Dewatering, of the Special Provisions requires a graphic depiction of how dewatering operations will

be performed. Please provide a brief narrative and graphic representation of your dewatering plan for inclusion in the SWPPP as amendment 1.

The general consensus is that MCM will place 6-foot diameter CMP into the water as a form for trestle footings. The inside bottom of the pipe will be lined with sandbags to minimize transfer of water across the CMP boundary. A tremie pour will seal the bottom of the pipe.

After much discussion, the RE suggested treating water in contact with concrete in the pipe with muriatic acid until the pH is below 8.5. The State will test the water with its calibrated pH meter. When the water pH is less than 8.5, the RE will allow the water to be discharged to the pier 2 shaft area or across the river to a desettling basin located at least 32 meters from the live stream. Also, the water may be removed from the pipe without any pH modification and used for dust control outside the 100-year flood elevation.

- The State is interested in acquiring the authorization to fuel equipment on the gravel bar. If MCM wishes to proceed with acquiring the authorization, the State recommends submitting the exact same BMP proposal to the RE as was proposed at your Van Duzen River Bridge project.
- The State requests manifests for shipping and disposal of contaminated material.

I do not know the specification that requires the contractor to furnish manifests but I will investigate at a later date.

- The State will require a plan for handling of drilling spoils. Details of the requirements for the plan were not discussed.
- The State is concerned that sawdust and wood debris from trestle construction could fall into the South Fork Eel River. The RE recommends caution and diligent clean up of sawdust but will not require the operation of a vacuum during wood cutting and drilling.

If you have any questions, please contact me at (707) 599-6365.

Sincerely,
MERCER-FRASER COMPANY


Justin Porteous
Engineer

3-4" pump
HOC in gravel

cc: Job File

EXHIBIT

X

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**

STATE OF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

NORTH REGION CONSTRUCTION

PO BOX 699

GARBERVILLE CA 95542

PHONE (707) 925-6218

FAX (707) 925-6391

285 file 8.0

285 file 9.3

Attn: Ruby SDI

fixed 408 281 9301 ✓

1:05 pm

1/8/08

Flex your power!
Be energy efficient!

January 8, 2008

cc: J. Ham

Contract 01-397514

MEN-101-KP 159.6/162.0

REALIGN ROADWAY @ CONFUSION HILL

Mr. Evan Paine
MCM Construction, Inc.
PO Box 620
North Highlands, CA 95660

Faxed (916) 334-0562 and mailed

Dear Mr. Paine:

Bridge 10-300 Grouting Operation

Due to current methods being utilized; current weather conditions; and subsequent concerns regarding the quality of the product being provided, the immediate termination of grouting operations on this Bridge has been implemented.

The existing field conditions indicate that the grout tubes contain a substantial amount of water from ongoing precipitation events. During the current grouting operations being utilized, the vent tubes are spilling and depositing cementitious material onto the bridge deck and subsequently into "Water of the State", a definite permit violation. The lack of containment of cementitious material during grouting operations at the vent locations is unacceptable.

As you probably know, the ducts that haven't been grouted are completely full of water, which is out of compliance with Standard Specification 50-1.07. Your sub-contractor, Schwager Davis, has indicated that they believe it would be acceptable to displace the water during grouting. This will not be acceptable. The ducts will be free of water and debris prior to grouting in accordance with Standard Specification 50-1.09.

Furthermore, due to the submerged state of the tendons, proof shall be provided by MCM Construction that rusting of the prestressing steel is not occurring. Rejection of the tendons is eminent in accordance with Section 50-1.05.

Lastly, the grout pump used by your subcontractor has an oil leak that leaks continuously while the pump is running. This equipment must be repaired or removed and replaced prior to further grouting.

We are available to discuss this situation at your earliest convenience.

Items were addressed
and verbal approval from Dan Stiles
was given on 3:00 pm to resume work.
Last two tubes were grouted last night
on the North Bridge 10-0300.
g. Davis

RECEIVED TIME JAN. 8. 1:12PM

STATE OFF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

NORTH REGION CONSTRUCTION

PO BOX 699

GARBERVILLE CA 95542

PHONE (707) 925-6218

FAX (707) 925-6391



*Flex your power!
Be energy efficient!*

Bridge 10-300 Grouting Operation

Sincerely,

A handwritten signature in cursive script, appearing to read "Dan Stiles".

DAN STILES

Structures Representative

A handwritten signature in cursive script, appearing to read "Sebastian Cohen".

SEBASTIAN COHEN

Resident Engineer

cc: Project Records 5
OSC

EXHIBIT

Y

Declaration of Julie Macedo

**Prosecution Team Case-in-Chief
Confusion Hill Bypass Project**



Main Office

P.O. BOX 620 / 6413 32nd Street / North Highlands / CA 95660
(916) 334-1221 Estimating / Engineering FAX (916) 334-0562
Accounting FAX (916) 334-8355

Southern California Regional Office

P.O. BOX 867 / 19010 Slover Ave. / Bloomington / CA 92316
(909) 875-0533 Engineering / Accounting FAX (909) 875-2243

FAXED 408-281-9301

January 11, 2008

SCHWAGER DAVIS, INC.
198 Hillsdale Avenue
San Jose, CA 95136

LTR No. 285-141

Re: Contract 01-397514
Confusion Hill 101 Realignment
Job Performance

Attn: Guido Schwager/Rudy Schmidt

Gentlemen:

Reference the Caltrans letter dated January 8, 2008 that was previously faxed to you and the attached email from Caltrans dated January 9, 2008.

In addition to the attached, there have been numerous correspondences between, Caltrans, MCM and SDI regarding containment. When Mr. Schmidt attended the job meeting approximately two months ago containment was one of Caltrans main concerns. The events on January 8, 2008 nearly required a discharge report for the uncontained grout falling into the river which does nothing but cause discontent with Caltrans and the various agencies, not to mention legal and financial ramifications. This will not be tolerated. Efforts must be made to contain your grout especially when it comes to the Segmental Bridge.

Once the grout is contained it must also be properly disposed. Attached are several photos of your grout that was neither contained nor cleaned up. Proper containment of the grout will then only require minimal cleanup. As you have witnessed, not containing and cleaning your work areas could potentially suspend work. Attached also is a picture of strand left over from the North bridge. This material should also be picked and removed. Strand has been left at the South bridge for weeks. SDI has stated that they are making provisions to have dump bins and/or recyclers for this material. However, material containment and removal must be practiced daily throughout the remainder of the job. You are reminded of the required waste disposal and recycling report that I faxed you earlier per our Subcontract Special Provision 23.

Dealing with the SDI grout mess, the SDI left over duct and the SDI left over strand is SDI's responsibility. Our Superintendent, James Ham, has made numerous requests for SDI to manage this issue that has gone largely ignored until Caltrans nearly shut the SDI operation down. This type of performance during the Segmental construction will have severe consequences. Attached is a list documenting specific instances of questionable performance.

Attn: Evan Paine

1. Do not make any attempt to clean up or pick up trash and debris at north or south locations.
2. When asked to move equipment have a total misunderstanding of contract they think MCM is supposed to move rig tie down load on their truck and handle all their equipment and all their materials with out them even present on site. *mcm truck*
3. They have Ben ask to clean up the site at north bridge since their work started their month ago but ignore to pick up their extra duct leaving it for MCM to pick up.
4. At south bridge there is *strand* stand lying all over the ground for over 4 weeks. They have Ben asked to pick it up.
5. Do not ever have the right material such as grout tubes and extensions to extend their vent tubes they made no attempt to contain their grout.
6. On North Bridge work was very sloppy excessive grout spilled all over top of back wall 5" deep and all over geo drain.
7. SDI has left the job numerous times with out clean up with out getting pre paired for next phase of their work with out communicating when they would be back or what they needed from MCM.
8. Extra work bill on at least 4 occasions they have signed them on site in front of us then ripped their copy up and threw it in trash can.
9. On January 2nd I James Ham had extensive conversations with foreman James and with Rudy about their responsibility to clean up job at 3:30PM I offered to SDI James that he could use our 3 dumpster only today because I did not have them full and they where scheduled to be picked up in the morning and because of vacation I did not have forces to fill them.
10. On Friday January 3, 2008 Rudy call 3 times to get the phone number from my assistant Ashley for the Dump company on Thursday I told James he could get the phone number off the dumpster themselves it is very apparent that SDI does not make any effort to help themselves or have any concept of their job or their responsibilities.