

Greg Roberts

From: [REDACTED]
To: Greg Roberts
Cc: [REDACTED]
Subject: RE: Structural engineer
Attachments:

Sent: Mon 4/16/2007 3:31 PM

Greg,

I am sorry to hear that your wife is going through some health issues. I hope and pray that everything is going to be OK.

We discussed the peer review idea this morning during the PM Meeting. I have known of peer reviews to be had either when a designer cannot design to a particular budget or when an error in design results in a claim. In most cases, a peer review is called by the one to whom the Designer is directly contracted (typically Owner). Another instance that I have known of a peer review being called for is when a GC has an issue with a design and has such review done in preparation for an unavoidable legal battle. In all cases, the professional care standards for a licensed professional dictate that the one being asked to perform the peer review make the original designer aware. A peer review initiated by us would most certainly sever any relationships between the parties going forward and cement an alliance between the Owner and Designer against Choate. Considering how our contract arrangement is structured, it would be the absolute last resort for us to initiate a peer review of our own accord. It would only come if we have determined that we must somehow defend ourselves in a legal showdown. I do not think we are there yet. Unless the Team knows of something for which I am unaware, I would suggest we continue basic blocking and tackling by reviewing the documents, submitting RFI's timely, following up and ensuring adequate responses to RFI's, and by documenting issues, delays and decisions.

Please everyone let's schedule a conference call if I am missing something. Thanks to all for your diligence and hard work on this Project.

[REDACTED]

Choate Construction Company

101 West Mulberry Boulevard

Suite 200

Pooler, GA 31322

Main (912) 790-0011

Fax (912) 790-0010

From: Greg Roberts

Sent: Friday, April 13, 2007 5:03 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Structural engineer

[REDACTED]

We previously talked about having a peer review done for this project. I believe that after yesterdays meeting and all of the issues with change orders that this would be in our best interest. I think we should definitely consider some other options and avenues for protecting ourselves after all of the conversations I have had with Mike and conversations with several other people. please call me if you would like to discuss this further. Thank You

You forwarded this message on 2/22/2007 7:35 AM.

Greg Roberts

From: [REDACTED]
To: [REDACTED] **Sent:** Thu 2/22/2007 7:32 AM
Cc:
Subject: RE: Berkman Plaza: Safety
Attachments:

Thanks for sharing. Please ensure that Choate does not take any responsibility for designing, recommending or suggesting related to anyone's rigging. We should however point out when any equipment is incorrect for the situation. Yeah, I know... fine line. Thanks again.

[REDACTED]

Choate Construction Company

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We have moved! Please update your records to reflect our new address.

From: [REDACTED]
Sent: Thursday, February 22, 2007 7:19 AM
To: [REDACTED]
Subject: FW: Berkman Plaza: Safety

FYI

[REDACTED]

Choate Construction Company

101 West Mulberry Boulevard, Suite 200

Greg Roberts

From: [REDACTED]
To: Greg Roberts; [REDACTED]
Cc: [REDACTED]
Subject: RE: Southern pans safety
Attachments:

Sent: Wed 3/28/2007 1:20 PM

I suggest that we have an actual excerpt from the OSHA manual posted in the trailer and provided to the sub. Our Sub Agreement is based on adhering to OSHA standards and that must be the reference for our position.

[REDACTED]

Choate Construction Company

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From: Greg Roberts
Sent: Wednesday, March 28, 2007 10:36 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Southern pans safety

Today Robbie and I witnessed a person working on the second floor deck without a harness on and past the CAZ line set up by southern pan. I informed Tim that this was not acceptable and anyone past the CAZ must be tied off. The response from Tim was that as long as you are not within 6 feet of a leading edge you did not have to be tied off. My policy on this matter is that anyone inside the CAZ must be tied off or they must run another warning line for people in the access zone to warn them of the leading edge. they do not want to run a second warning line so I informed them that anyone past the CAZ MUST be tied off at all times even if they are not within 6 feet of the leading edge. It is too easy for someone to not pay attention and get within 6 feet of a leading edge and get hurt. Can you please reiterate this to Tim Postman and assure him that there will be a ZERO tolerance policy regarding this issue. Thank You