



DON J. BABCOCK



Mr. Babcock is a Graphics Specialist and Senior Data Analyst with Long International and has over 45 years of experience in the preparation of professional graphics, interactive multimedia products, and document databases. Mr. Babcock has worked in diverse industries including architecture, civil and petroleum engineering, exploration geology and geophysics, technical illustration, publishing, and advertising. Over the past 32 years, he has served the disputes resolution and project management industries designing and producing static and interactive visual materials for use in litigation, arbitration, and mediation proceedings. Mr. Babcock has also provided analytical and data management services on many projects including drawing submittal analysis, project impact analysis, change order analysis, and preliminary schedule analysis. He has served as a Managing Consultant on national and international projects, including construction,

government contracts, environmental management and remediation, and intellectual property disputes, with claims ranging in size from US\$50,000 to US\$5 billion.

EDUCATION

Exploration Cartography Certification, Midland College, 1975

A.S., Architectural Drafting and Design, Texas State Technical College, 1974

Undergraduate Studies, McMurry University, Western Texas College, 1971–1972

TECHNICAL EXPERIENCE

Representative U.S. and international technical experience includes:

- Management of production of static and multimedia visuals in support of claims mediation, arbitration and litigation on construction, civil, public works, government contracts, and environmental claims
- Management of production of static and multimedia visuals in support of project management/quality assurance (QA)/quality control (QC) on construction and civil projects
- Identification and analysis of impacts of delays, disruption, acceleration, and loss of labor productivity
- Production of interactive multimedia for training, informational, and educational purposes
- Database design and implementation
- Production and publishing of industry publications

PROJECT EXPERIENCE

Mr. Babcock has served as a Managing Consultant on more than fifty claims ranging in size from US\$50,000 to US\$5 billion. He has provided graphics support and data analyses for claims on numerous types of projects, both in the U.S. and internationally. Representative projects include the following:

Petrochemical, Oil Refining, and Power Plant Facilities

- LNG Project, Australia – Performed analyses of staffing levels and assisted with development of cost reconciliation analyses on a US\$5 billion LNG project claim. Prepared finalized reports and associated figures and tables.



- Hydroelectric Project, Arkansas – Performed analyses of manpower productivity and utilization on a US\$30 million hydroelectric project claim. Provided visuals in support of all aspects of the claim including charts and illustrations.
- Oil Sands Oil Upgrading Facility, Alberta, Canada – Produced visual support for presentation on a US\$100 million claim for property damage and US\$1 billion in business interruption losses resulting from fire damage. Constructed complex CPM graphics and site, plan, and elevation drawings detailing all aspects of the incident and reconstruction. Prepared database analyses of component inventory flow.
- Floating Production, Storage and Off-loading Facilities, Brazil – Produced illustrations and detailed schedule graphics related to US\$750 million in claims for disruption, delays, changed conditions, and increased costs on a lump sum turn-key contract.
- Fertilizer Plant, Iraq – Prepared schedule graphics, diagrammatic charts, and illustrations relating to multiple contractor and subcontractor claims in support of analysis of project costs and schedules, report preparation, and negotiation of claims related to the design, procurement, and construction of a fertilizer plant.
- Pipeline, Montana – Provided static diagrams and illustrations in support of evaluation of a horizontal directional drilling contractor's plan as well as its actual execution of a drilled crossing of a creek and wetland area and the liability for the breach of an existing pipeline, the resulting release of product, and the damage to the environment.
- Cogeneration Facility, New Jersey – Provided drawing and Request for Information (RFI) analysis as well as complex CPM schedule graphics, diagrammatic charts, and illustrations in support of technical, delay, and labor productivity claims.
- MDI Plant, Louisiana – Provided schedule graphics and illustrations in an interactive multimedia application used in mediation of claims arising from delay in material fabrication, labor productivity, and utilization.
- Onshore Processing Facility, Sakhalin Island, Russian Federation – Provided schematic illustrations in support of claims arising from the construction of an oil processing plant.
- Natural Gas Pipeline, India – Provided detailed flow charts and schematics to support defense of claim of equipment failure to meet specifications.
- Natural Gas Gathering System, Wyoming – Constructed parts and component inventory database. Performed analyses of inventory flow through warehouses to field.
- Power Transmission Project, Alaska – Provided illustrations and diagrammatic charts illustrating construction problems encountered as a result of permafrost site conditions.

Building Projects

- Filmore Center Community Project, San Francisco, California – Performed preliminary schedule analysis and created illustrations, charts, and complex schedule graphics in support of claims associated with the construction of an apartment project covering over seven city blocks.
- Venetian Casino and Resort, Las Vegas, Nevada – Created numerous illustrations and complex schedule graphics in support of contractor's claim associated with the construction of a world-famous resort hotel and casino.
- Convention and Exhibition Center, Massachusetts – Prepared schedule graphics for retrospective windows analysis using the updated and as-built schedules in order to assess the validity of the owner's claim against the design team.



- FBI District Office, Washington, DC – Prepared interactive, animated presentations depicting construction problems and change order impacts arising from the GSA construction directives for federal buildings following the Murrah Building attack.
- Hoover Dam Visitor Center – Produced illustrations depicting a multitude of issues relating to the construction of the Hoover Dam Visitor Center and a parking structure. Created an interactive multimedia presentation for court/jury education regarding the site and disputed phases of construction. Performed drawing analyses and document issue coding in support of claims.
- Markham Park, Dade County, Florida – Provided illustrations and schedule graphics associated with claims arising from the construction of a new park constructed on reclaimed lands.

Highways, Transportation, and Infrastructure Projects

- Central Artery/Tunnel Project, Boston, Massachusetts – Produced illustrations, charts, schedule graphics, and interactive multimedia projects in support of numerous contract disputes over the entire length of the “Big Dig” Project, including the Fort Point Channel leak and the Federal Reserve Bank project delay, electronic controls and signals, among others.
- Airport Terminal Project, Pittsburgh, Pennsylvania – Provided illustrations, charts, and schedule graphics in support of claims associated with the landside terminal construction project.
- Missouri State Highway Department – Prepared illustration and schedule graphics in defense of contractor claims arising from the construction of a major highway bridge.
- Sewer System Rehabilitation Project, Eastlake, California – Created complex phased construction graphics and schedule graphics for a claim associated with rehabilitation of a sewer main pipe.
- Mike O’Callaghan–Pat Tillman Memorial Bridge, Arizona/Nevada – Prepared illustrations, charts, graphs, and schedule graphics in defense of claims arising from the collapse of a cableway crane system.
- Subway Project, Newark, New Jersey – Provided interactive multimedia support for claims arising from construction of a rail yard and rail car maintenance and repair facility.
- Metro Subway Project, Los Angeles, California – Produced illustrations, charts, graphics, and schedule graphics in support of quality control and reasonableness review of a schedule delay analysis for a tunnel-boring contract.
- Bay Area Rapid Transit District, San Francisco, California – Produced schedule graphics and illustrations associated with a US\$65 million train control contract.
- John Wayne Airport, Irvine, California – Produced detailed As-Planned and As-Built Schedules, illustrations, and diagrammatic charts for the contractor on a US\$100 million airport expansion project.
- Light Rail and Metro Subway Projects, Los Angeles County Transportation Commission – Prepared schedule graphics, charts, and diagrams for project oversight and review.
- Subway Tunnel Fire, Los Angeles, California – Produced illustrations in support of findings of an investigation of the cause of a major fire during the construction of a subway tunnel.

Commercial, Educational, and Medical Facilities

- VA Hospital, California – Created interactive schedule graphics in support of delay claims on a Veterans Administration hospital remodeling project.
- Retirement and Nursing Home, La Jolla, California – Prepared an interactive schedule presentation in defense of claims arising from a dispute involving impacts of contaminated soils to an independent living facility, a continuing care facility, and a parking structure.



- High Schools, Anaheim, California – Created schedule graphics and charts and incorporated same into an interactive presentation on claims arising from the construction of three high schools.
- High School, Isla Morada, Florida – Created interactive illustrations and schedule graphics in association with claims arising from the construction of a new high school.
- Boutique Shopping Center, Los Angeles, California – Prepared schedule graphics and charts and incorporated same into an interactive presentation for mediation for a construction delay claim.

Government Contracts

- AC-130U Gunship Project – Prepared illustrations, schedule graphics, and interactive multimedia presentations in support of contractor claims arising from the design and development of an aerial weapons platform.
- Challenger Electronic Warfare System – Prepared illustrations, schedule graphics, and interactive multimedia presentations in support of contractor claims arising from the design and development of an airborne electronic warfare system.

Intellectual Property Disputes

- Seismic Data Licensing Violation – Produced illustrations, animations, and an interactive multimedia program for prosecution of a US\$50 million trade secrets dispute involving license violation of proprietary seismic data.
- Coal Dust Control System for Coal Conveyor Systems – Created process animations, timelines, and interactive multimedia programs for use in litigation involving a claim for patent and trade secrets violations for conveyor coal handling systems.
- Pharmaceutical Patent Infringement – Prepared illustrations and interactive multimedia presentations for use in a claim involving dilution of market by a patent infringing prescription drug.

Environmental Projects

- Provided graphics and schematics as well as database development in support of waste characterization, remediation, and allocation proceedings for:
 - Lowry Superfund Site
 - United Steel Drum Site
 - Harley Davidson Site
 - Stringfellow Site

Dams, Wharfs, and Wastewater Treatment Projects

- Dam Rehabilitation Project, New Mexico – Prepared detailed As-Planned and As-Built Schedule analyses for the contractor on an earth-filled dam project in New Mexico resulting in a US\$55 million settlement for the contractor.
- Roller Compacted Concrete (RCC) Dam Project, Utah – Provided forensic construction illustrations, cause effect matrices, and schedule graphics in support of contractor claims arising from construction of an RCC dam.

Seminar Presentations

- Interpersonal Communications Seminars – Prepared interactive multimedia presentations for nine different interpersonal communication training seminars for a nationally and internationally known presenter.



- Claims Avoidance Seminar – Prepared an interactive presentation for a claims avoidance seminar for a major manufacturer of solar generation systems.

Oil and Gas Land Services

- Title – Performed title searches and prepared ownership reports involving complex ownership of numerous mineral projects in the Rocky Mountain region, Texas, and New Mexico.
- Due Diligence – Performed due diligence in connection with sales and purchase of oil and gas properties. One project encompassed nearly half a million acres of exploration inventory.
- Leasing – Negotiated for and purchased leases for oil and gas exploration. Negotiated surface use agreements associated with them.
- Curative – Prepared instruments to cure defective title.
- Permitting – Negotiated permits for geophysical surveys and pipeline construction. Negotiated damages remuneration for surface disturbance associated with pipeline construction and surface facilities.
- Mapping and Illustration – Prepared digital maps, plats, and illustrations associated with oil and gas prospecting and development.

PROFESSIONAL EXPERIENCE

Long International, Inc.

Denver, Colorado Area (October 2020 to Present)

As a Graphics Specialist and Senior Data Analyst, Mr. Babcock prepares complex static and interactive multimedia graphics for use in litigation, arbitration, mediation, and other dispute resolution proceedings. He also provides analytical and data management services on many projects including drawing submittal analysis, change order analyses, manpower productivity analyses, delay impact analyses, and preliminary schedule analyses in support of dispute resolution.

Zara Media Corporation and Zara Resources Corporation

Littleton, Colorado (July 2003 to October 2019)

As President of Zara Media Corporation, Mr. Babcock generated and directed the production of complex static and interactive multimedia projects in support of dispute resolution by mediation, arbitration, and litigation. He also performed drawing, change order, manpower, and schedule analyses in support of such projects. In addition, he provided interactive multimedia solutions for seminars and meetings, and document databases.

As a Petroleum Landman for Zara Resources Corporation, Mr. Babcock performed complex title analyses, due diligence, curative, lease negotiation, surface negotiation, and geophysical and pipeline permitting in support of the oil and gas and wind energy industries. He also provided GIS cartography and graphic illustrations used in presentations for sales, partnering, and budgeting purposes.

Navigant Consulting, Inc.

Denver, Colorado (April 1992 to July 2003)

As Senior Managing Consultant, Mr. Babcock collaborated with experts and analysts to conceive, design, and execute visual support in all media including interactive multimedia, animation, and static graphics. He managed trans-local projects involving media staff and support from multiple offices and locations.



He performed analyses of drawings, RFIs, change orders, and schedule delay impacts. Projects included petrochemical plants, transportation, infrastructure, and commercial facilities.

Kellogg Corporation

Littleton, Colorado (May 1988 to April 1992)

As a Senior Graphics Technician, Mr. Babcock designed and executed technical illustrations, graphs, charts, and schedule graphics in support of claims resolution, project management oversight, QA/QC, and environmental projects. He assisted with drawing, change orders, RFI, manpower, and scheduling analyses and designed and implemented databases in support of analyses. He produced industry newsletters and marketing materials for Kellogg as well.

Master Properties

Denver, Colorado (April 1986 to May 1988)

As a Petroleum Landman, Mr. Babcock researched and prepared mineral title reports, marketed producing oil and gas properties, and designed a spreadsheet-based production decline and economics analysis application. He produced all graphic materials used by the company as well.

Southland Royalty Company

Denver, Colorado (April 1980 to March 1986)

As District Manager of Exploration Drafting, Mr. Babcock managed a staff of draftsmen who created and maintained geological, geophysical, and land maps. He oversaw the design and creation of technical support graphics used in oil and gas exploration. He designed, executed, and assembled sales and marketing packages and budget presentations.