

## **GARRETT J. BROWN**



Mr. Brown is a Principal with Long International and has 30 years of progressive work experience related to various aspects of engineering, procurement, construction, and start-up/commissioning. Key work experience includes planning and team management, project cost and schedule controls, change order management, including change order pricing and resolution, subcontract management, and arbitration/litigation experience related to construction claims. Mr. Brown also has expertise in the development and implementation of process improvements to increase business unit and project workflow efficiency. He has performed schedule delay and loss of productivity analyses and has evaluated change orders for scope growth and project time and cost impacts. His project experience includes combined-cycle and simple-cycle power plants, oil refineries, petrochemical facilities, materials handling amenities, coke handling facilities, water storage facilities, and above-ground storage tanks. Mr. Brown is proficient with the use of the scheduling programs Oracle Primavera Project Planner P6 and Primavera P3 3.1. He is well versed in the use of all Microsoft software products including Excel, Word, PowerPoint, Access, Visio, Power BI, and Project. Other software experience includes SAP, InEight Project Management Platform, and Tableau.

### **EDUCATION**

M.B.A. Program (partially complete), Regis University, 2002  
B.S., Civil Engineering, Washington State University, 1994

### **PROFESSIONAL REGISTRATIONS**

Engineer-in-Training – State of Washington, 1994

### **CERTIFICATIONS**

Lean Six Sigma – Green Belt Certification, 2008

### **PROFESSIONAL AFFILIATIONS**

Association of Business Process Management Professionals  
Business Process Management Institute  
Project Management Institute (No. 7262686)  
Association for the Advancement of Cost Engineering International (AACEI – No. 405697)  
American Society of Civil Engineers (ASCE – No. 402030)

### **TECHNICAL EXPERIENCE**

Representative U.S. and international technical experience includes:

- Project estimating, quantity takeoffs, and project scope pricing
- Project planning, startup planning, and turnover assistance
- Activity-based costing for scope budgeting and cost control
- CPM schedule development and proactive monitoring
- Project billing and payment implementation

- Change order pricing and negotiations
- Request for information (RFI) and change order process management
- Evaluation of project issues that may or may not affect the project schedule
- Installed quantity and progress verification and monitoring
- CPM recovery schedule preparation and implementation
- Contract administration and subcontractor management
- Effective resolution of project problems and unapproved changes
- Job cost and labor hour variance modeling and analysis
- Document discovery, research, and computerized database coding
- Impact correlation (RFIs, changes, late equipment, third-party interference, weather, strikes, etc.) to schedule activities and cost accounts
- Lost productivity quantification and analysis
- Extended project overhead and home office overhead cost quantification
- Calculation of project damages based on total cost, modified total cost, specific issue pricing, and measured mile methodologies
- Graphical and oral presentation of results, conclusions, and opinions
- CPM schedule delay, time extension, and acceleration analyses
- Change order management and preparation
- Project cost and schedule controls
- Baseline CPM schedule preparation and updating
- Project planning, status updating, and performance measurement and analysis
- Project management consulting
- Corporate strategy, leadership, and marketing
- Business processes and procedures assessments and evaluation
- Process and value-stream mapping consulting
- Database field mapping to standardized means and methods
- Application of Lean Six Sigma tools and methods to improve business processes and procedures
- Development of historical performance analysis procedures for comparison to current project estimates and active projects
- Implementation of standardized project controls procedures and processes to attain operational excellence
- Field operations assessments for the purpose of measuring performance within standardized procedures and processes for field project controls and home office monitoring and guidance

**PROJECT EXPERIENCE**

Representative U.S. and international project experience includes the following:

**Oil Refinery, Petrochemical, Chemical Plants, Offshore Oil and Gas Production Facilities, LNG, and Industrial**

- Prepared an expert quantum report, on behalf of the owner, containing detailed assessments and valuations of a contractor's claims for unsuitable site conditions on an LNG project in northern Australia. The quantum assessment included a substantiation analysis of claimed costs relative to alleged impacts from improper and inadequate relied-upon information from the owner.
- Defended an owner of an LNG terminal project in Australia from a contractor's change order claims. Evaluated the contractor's claims for additional indirect costs. Analyzed data in support of the owner's defense of a \$1.2 billion claim for extended indirect costs. The analysis required the development of a relational database of project time and invoicing records to expeditiously evaluate and quantify the contractor's cost claims.
- Reviewed and evaluated a contractor's project-related costs and performance data in support of an owner's \$2.5 billion claim for fraud and gross negligence against the contractor on a multibillion-dollar refinery in South America. The analysis and expert report included an interactive project controls diagram that allowed the reader to navigate and probe claim component causations.
- Reviewed and evaluated a contractor's cost estimates, change requests, project-related costs, and performance data in support of an owner's \$2 billion claim for fraud and gross negligence against the contractor on a multibillion-dollar refinery on the U.S. Texas gulf coast.
- Performed cost and schedule analysis and productivity monitoring and analysis for a cryogenic unit installation project in Memphis, Tennessee.
- Provided project management and cost and schedule control for a chemical plant pipeline and support steel installation project in Freeport, Texas.
- Performed an analysis of a contractor's \$2.5 million claim for schedule delay and productivity loss.
- Provided project management and served as a client liaison for a cost-reimbursable project. The project included pond preparation and installation of double-layered polyethylene liners and a leak detection system. The project also included civil remediation of two 11.5-acre brine ponds in Oyster Creek, Texas.
- Performed schedule and cost control for an ethylene glycol plant, including installation of above-ground chemical storage tanks, located in Fahaheel, Kuwait.
- Provided schedule and cost control for a polypropylene plant, including installation of chemical storage pressure spheres and associated systems, located in Fahaheel, Kuwait.
- Participated in construction planning and field erection of above-ground carbon and stainless-steel storage tanks in Martinez, California.
- Participated in a fluid catalytic cracker unit project located in Richmond, California.

**Power Plant Projects**

- Provided project management services including change order development and schedule optimization for a 640 MW combined-cycle power plant in the U.S. southeast region.

- Managed the scheduling team for a refining company. Oversaw scheduling processes including proposal schedules, project baseline schedules, and project schedule maintenance including business process modeling and key performance indicators metrics analysis.
- Served as EPCM Leader for the development of optimized engineering and construction management processes and procedures for aeroderivative gas-fired turbines such as GE's LM6000 and LMS100.
- Performed project cost control and managed planning, scheduling, and project information systems for a 720 MW gas-fired combined-cycle power plant. Also acted as an engineering liaison during the project.
- Oversaw project cost and schedule, document control, startup, and commissioning for a 1,100 MW gas-fired combined-cycle power plant system turnover. Also, acted as an engineering liaison during the project. Analyzed and prepared contractor's \$50 million claim for schedule delay and productivity loss.

**Material Handling and Process Projects**

- Managed the day-to-day construction operation for the construction of conveyors, transfer towers, a rail reclaimer, and offshore ship loaders for a 2,000 ton per hour coke handling facility.
- Served as Construction Supervisor responsible for cost and schedule analysis, heavy lift planning, and productivity measurement and analysis related to a 1.24 million tons per year molten iron making facility.
- Performed analysis and prepared a contractor's \$10 million claim for schedule delay and productivity loss.

**PROFESSIONAL EXPERIENCE****Long International, Inc.**

*Kansas City, Kansas Area (February 2014 to Present)*

As a Principal with Long International, Mr. Brown provides claims analysis services for both owners and contractors. Specific responsibilities include job cost analysis, schedule analysis, document database development, and arbitration/litigation support. He provides clients with CPM schedule delay and acceleration analysis, job cost variance modeling, change order impact analysis, issue identification, correlation of impacts to schedule activities, claims preparation and negotiations, and damages quantification.

**Kiewit Power Constructors, Inc.**

*Lenexa, Kansas (July 2013 to February 2014)*

As Engineering Director, Mr. Brown was responsible for defining, developing, and implementing the District Office Operational Support Group. He also implemented enterprise resource planning (ERP) processes and procedures to identify and eliminate work process waste and reduce variation to achieve more efficient and effective operational results.

**Kiewit Power Constructors, Inc.**

*Lenexa, Kansas (April 2012 to July 2013)*

Mr. Brown served as Operations Support Manager. In this role, he provided support and guidance during the estimation and execution of major construction projects. Mr. Brown implemented ERP across multiple projects and districts and performed value-stream mapping of current process workflows to identify lead time gaps and variances.

**Kiewit Power Engineers, Inc.***Lenexa, Kansas (August 2010 to March 2012)*

Mr. Brown served as EPCM Operations Manager of the AERO/ARCTIC Program. In this role, he led a team of engineering, procurement, and construction management personnel to identify and develop the most effective means and methods for executing aeroderivative gas-fired power plant projects. The goal of the team was to reduce the costs and risks associated with estimating and executing LM6000 and LMS100 projects, with an emphasis on reducing the peak crew size and total field man-hours required on the projects. Mr. Brown implemented ERP across multiple projects and districts and performed value-stream mapping of current process workflows to identify lead time gaps and variances.

**TIC Energy & Chemical, Inc. – Subsidiary of The Industrial Company (TIC)***Freeport, Texas (October 2008 to July 2010)*

As Senior Operations Manager, Mr. Brown was responsible for the day-to-day operation of a \$150 million per annum small capital and maintenance services company. He implemented enhanced business systems and process improvements for executing small capital projects and led the relationship building process for key accounts of the capital construction business unit.

**Gulf States, Inc. (GSI) – Subsidiary of The Industrial Company (TIC)***Freeport, Texas (January 2005 to September 2008)*

As Corporate Project Controls Manager, Mr. Brown was responsible for implementing core business processes and procedures for a \$150 million per annum small capital and maintenance services company. He implemented the TIC SAP Program and the GSI Supervisors Core Curriculum Training Program. In addition, he led the implementation of Lean Six Sigma techniques to measure and improve labor cost reimbursement turnaround from over 60 days to 10 days. Mr. Brown was also responsible for deploying and teaching project planning training to 100 frontline supervisors.

**TIC – The Industrial Company***Malvern, Arkansas (November 2001 to December 2004)*

Mr. Brown served as Senior Project Engineer for the Hot Spring 720 MW Gas-Fueled Combined-Cycle Power Plant Project. In this role, he had overall project financial management of a \$320 million contract. He performed change order management, maintained job cost reports, and performed project controls and related schedule and productivity analysis. Mr. Brown was a member of the Project Safety Committee and Total Quality Management Team. As part of the Joint Venture Team, he led the development of cost control systems suitable for all companies in the joint venture. As part of the Extension Change Order Request Team, he was instrumental in the creation and negotiation of a more than \$30 million revision to the contract value, which ensured a successful and profitable project.

**TIC – The Industrial Company***San Marcos, Texas (October 2000 to October 2001)*

Mr. Brown served as Project Engineer for the Hays Energy 1100 MW Gas-Fueled Combined-Cycle Power Plant Project. He was responsible for overall project coordination among onsite engineers and field superintendents. In addition, he oversaw change order management, job cost reporting, project document controls, and schedule and productivity analysis for the \$130 million project. He developed a commissioning system turnover program that the client subsequently adopted and employed. Mr. Brown was a member of

the Project Safety Committee and Total Quality Management Team. As part of the Claims Development Team, he was instrumental in developing and presenting a request for a more than \$40 million equitable compensation claim.

**Chicago Bridge & Iron Company (CBI Company Ltd.)**

*Aruba, Dutch Caribbean (April 1999 to September 2000)*

As Site Project Manager, Mr. Brown managed a \$10 million contract that involved the onsite planning, scheduling, and execution of a multi-disciplined contract for the erection and commissioning of a coke handling facility for a coastal Aruba refinery. The work included structural and mechanical installations and commissioning and startup of conveyors, a reclaimers, and offshore ship loaders. Mr. Brown monitored the performance of civil and electrical subcontracts. In addition, he worked with a claims consultant to develop a successful \$5 million claim for recovery of costs associated with schedule delay. He also performed schedule analysis and provided responses to claim questions and rebuttals.

**Chicago Bridge & Iron Company (CB&I Constructors, Inc.)**

*Houston, Texas (January 1999 to April 1999)*

As an Estimator, Mr. Brown produced quantifiable project estimates for CB&I's proposals for water storage facilities and above-ground storage tanks in the U.S. south, southeast, and midwest regions.

**Chicago Bridge & Iron Company (CB&I Constructors S.A. (pty), Ltd.)**

*Saldanha, South Africa (April 1997 to December 1998)*

Mr. Brown served as Construction Supervisor for the Saldanha Steel Project, which won the 1998 Engineering News Record Project of the Year Award. In this role, Mr. Brown supervised the erection and commissioning of raw material handling conveyors and systems, including COREX structural and mechanical systems, and installation of water treatment, sludge, and slag granulation facilities for the production of molten iron from raw iron ore, coal, dolomite, and other additives. He performed heavy lift planning, progress reporting, and man-hour estimates for on-site supervision and was the liaison to the client for final acceptance of erection/installation/commissioning work. The peak direct hire workforce for the project topped 2,000 craft employees.

**Chicago Bridge & Iron Company (Arabian CBI, Ltd.)**

*Fahaheel, Kuwait (April 1996 to March 1997)*

As Project Engineer for the Equate Petrochemical Complex, Mr. Brown performed planning, scheduling, and project execution for the erection of miscellaneous storage tanks and spheres for ethylene glycol and polyethylene plants. CB&I received a 5-star rating from the client for finishing the project without injury, ahead of schedule, and under budget. Mr. Brown was singled out as performing exceptionally well on the project, and a letter of commendation was sent to the President of CB&I acknowledging Mr. Brown's performance and contribution to the success of the project.

**Chicago Bridge & Iron Company**

*Plainfield, Illinois (September 1995 to March 1996)*

Mr. Brown was a CAD Design Engineer. His duties as a computational design assistant included using Microstation CAD Software for the engineering and design of above-ground carbon steel storage tanks and elevated water storage structures.

**Chicago Bridge & Iron Company**

*Various locations throughout California (June 1994 to August 1995)*

As Field Engineer, Mr. Brown was responsible for field layout and dimensional control for the erection of various refinery process vessels and storage tanks. Also, he was a Field Engineer for the erection of a 180-foot-tall fractionator vessel for an FCC Unit in a major North American refinery.

**Washington State University (WSU)**

*Pullman, Washington (August 1992 to May 1994)*

As a Lab Teacher, Mr. Brown was responsible for classroom, laboratory manual, and computer-aided drafting materials. He taught undergraduate students enrolled in the engineering and architecture curriculum at WSU.

**PUBLICATIONS AND SPEAKING ENGAGEMENTS**

“Delay Damages,” Long International Article, November 2023.

“Waste Elimination,” Presentation for future leaders, December 2007.

“Transition to ERP Systems Execution,” SAP Roadmap Seminar, March 2007.

“Planning and Scheduling Seminar,” Presentation and Program Alignment, October 2006.

“Project Controls Process Logic,” Presentation and Discussion, September 2003.

**EXPERT REPORT PREPARATION**

- 2023    Prepared an expert report, on behalf of the contractor, containing detailed assessments and valuations of the contractor’s losses from cumulative impacts and other disruption caused by owner. The schedule delay and quantum assessment included a substantiation analysis of claimed costs relative to alleged impacts from excessive field changes by the owner and owner’s engineer.
- 2021    Prepared an expert quantum report, on behalf of the owner, containing detailed assessments and valuations of a contractor’s claims for unsuitable site conditions on an LNG project in northern Australia. The quantum assessment included a substantiation analysis of claimed costs relative to alleged impacts from improper and inadequate relied-upon information from the owner.
- 2020    Prepared an expert report that required the review and evaluation of a contractor’s project-related costs and performance data in support of an owner’s \$2.5 billion claim for fraud and gross negligence against the contractor on a multibillion-dollar refinery in South America. The analysis and expert report included an interactive project controls diagram that allowed the reader to navigate and probe claim component causations.