

1 PAUL HASTINGS LLP
PETER C. MEIER (SB# 179019)
2 SEAN D. UNGER (SB# 231694)
101 California Street
3 Forty-Eighth Floor
San Francisco, California 94111
4 Telephone: 1(415) 856-7000
Facsimile: 1(415) 856-7100

5
6 Attorneys for Cross-Complainants Mission Street
Development LLC, a Delaware limited liability
company, Millennium Partners Management LLC, a
7 New York limited liability company; Mission Street
Holdings LLC, a Delaware limited liability company;
8 Millennium Partners LLC, a New York limited liability
company; Christopher M. Jeffries, an individual; Philip
9 E. Aarons, an individual; Philip H. Lovett, an
individual; Sean Jeffries, an individual; John Luciano,
10 an individual; and Richard Baumert, an individual

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
01/09/2019
Clerk of the Court
BY: VANESSA WU
Deputy Clerk

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF SAN FRANCISCO

13 Laura S. Lehman, et al.,
14 Plaintiffs,

15 v.

16 Transbay Joint Powers Authority, et al.,
17 Defendants.

18 And Related & Consolidated Cases.

19 *This document applies to:*

20 *Lehman, et al. v. Transbay Joint Powers Authority,*
et al., Case No. CGC-16-553758

21 *Buttery, et al. v. Millennium Partners Management*
LLC, et al., Case No. CGC-17-556292

22 *Millennium Tower Association v. Mission Street*
Development LLC, et al., Case No. CGC-17-
23 *557830*

24 *Montana, et al. v. Mission Street Development*
LLC, et al., Case No. CGC-17-558649

25 *Ying, et al. v. Transbay Joint Powers Authority, et*
26 *al., Case No. CGC-17-559210*

27 *Maui Peaks Corp., et al. v. Mission Street*
Development LLC, et al., Case No. CGC-17-
28 *560322*

Lead Case Number: CGC-16-553758
Assigned for all purposes to the Complex
Litigation Department 304

**CROSS-COMPLAINANTS MISSION
STREET DEVELOPMENT LLC,
MILLENNIUM PARTNERS
MANAGEMENT LLC, MISSION
STREET HOLDINGS LLC,
MILLENNIUM PARTNERS LLC,
CHRISTOPHER M. JEFFRIES,
PHILIP E. AARONS, PHILIP H.
LOVETT, SEAN JEFFRIES, JOHN
LUCIANO, AND RICHARD
BAUMERT'S EVIDENCE IN
OPPOSITION TO ARUP NORTH
AMERICA LTD.'S MOTION FOR
SUMMARY JUDGMENT OR
SUMMARY ADJUDICATION OR
BOTH**

(VOL. 30: EXHIBIT 38, PART 3)

*[Filed Concurrently with Memorandum
and Separate Statement in Opposition]*

Date: January 23, 2019
Time: 10:30 A.M.
Dept: 304
Judge: Hon. Curtis E.A. Karnow

EXHIBIT 38 – PART 3

Construction of Buttress Shaft



Construction of Buttress Shaft



Bay Mud with Shells



Bedrock at Base Shaft – Mélange Matrix



Installation of Shoring Wall



First Lift of Excavation in Zone 1 and 2



Global Analyzer

The screenshot displays the Global Analyzer web application interface. At the top, the browser address bar shows the URL http://ga.arup.com/global_analyzer/home.php and the page title "Transbay Global Analyzer". The application header includes a logo and the text "Transbay Transit Center". A navigation menu contains links for HOME, ADMINISTRATION, CONSTRUCTION DOCUMENTS, HELP, and LOGOUT. The user is logged in as "Administrator" and has options for "Logout" and "User Settings".

The main content area features a map of the Transbay Transit Center. The map displays various instrumentation points and geotechnical exploration data. A legend on the left side of the map lists the following categories and items:

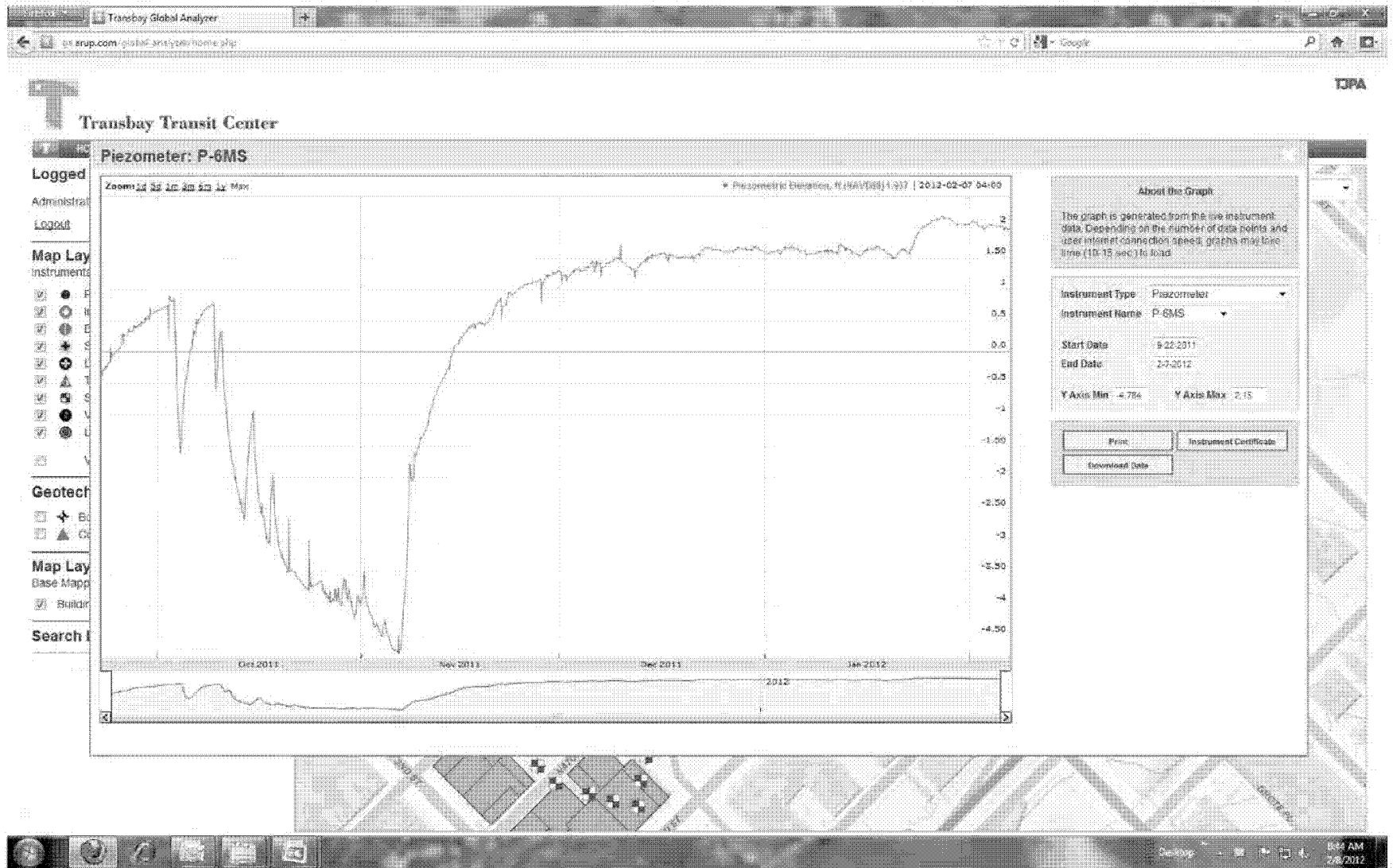
- Map Layers - Instrumentation:**
 - Piezometer
 - Inclinometer
 - Extensometer
 - Settlement Marker
 - Deep Settlement Marker
 - Tiltmeter
 - Survey Monument
 - Vibration Monitor
 - Linear Potentiometer
 - View Inactive Instruments
- Geotechnical Explorations:**
 - Borings
 - Core Penetration Test (CPT)
- Map Layers - Base Mapping:**
 - Buildings
 - Excavation Zone
 - Work Zones

The search instrumentation section includes a search box and a "Search" button. The map shows a grid of streets with various symbols representing the data points. A tooltip for a selected point lists the following data:

- M012
- P-024
- E-0308
- SV-021
- SV-041

The bottom of the interface shows a Windows taskbar with various application icons and a system tray displaying the time "4:33 PM" and the date "2/14/2012".

Global Analyzer



What we are trying to avoid...

Questions?

