



EXPERT ENGAGEMENT

Rule 702 / Methodology Statement

Matthew Zomerlei's opinions are based upon his education, training, and experience as a licensed general contractor, insurance appraiser, and building consultant, together with his direct inspection of the subject property, review of relevant materials, and application of reliable principles and methods commonly accepted within the construction and property insurance industries.

In forming his opinions, Mr. Zomerlei employs a methodology that includes:

- Visual inspection of accessible building components and assemblies
- Documentation of observed conditions through photographs and field notes
- Differentiation between reported conditions and conditions personally observed
- Evaluation of damage extent at the assembly and component level
- Assessment of repair feasibility based on construction sequencing, access, and serviceability
- Application of relevant building codes, manufacturer installation requirements, and industry standards where applicable
- Limitation of opinions to matters within his direct knowledge and observed conditions
- Consideration of alternative explanations where appropriate
- Exclusion of speculation regarding concealed conditions absent verification

Mr. Zomerlei's opinions are expressed within a reasonable degree of construction and insurance appraisal certainty and are limited to the scope of his assignment. He does not render opinions regarding policy interpretation, coverage determinations, or legal conclusions.

This methodology is consistently applied across matters regardless of retaining party, and is the same methodology he employs in neutral appraisal, arbitration, and consulting engagements.

Expanded Rule 702 / Daubert Defensibility Statement

Matthew Zomerlei utilizes a systematic, repeatable methodology grounded in accepted construction practices and insurance appraisal principles to evaluate property damage, repair feasibility, and scope of loss.

His process begins with direct on-site inspection of the subject property to identify and document observable conditions. Observations are recorded contemporaneously through photographs and field notes. Reported conditions are distinguished from conditions personally observed.



Damage assessments are performed at the building assembly level, evaluating how individual components interact within the broader building system. Repair feasibility opinions are based on constructability, access, sequencing, and the ability to restore function and performance without impairing adjacent components.

Where applicable, Mr. Zomerlei references building codes, manufacturer installation instructions, and recognized industry standards, including IICRC standards for water and mold-related losses and Haag guidelines for roofing systems. Standards are applied selectively and contextually rather than generically.

Mr. Zomerlei limits his opinions to matters within his professional expertise and does not speculate regarding concealed conditions unless such conditions are revealed or verified through repair activities or testing performed by others. His conclusions are qualified by stated assumptions and limitations.

This methodology has been developed through decades of hands-on construction experience, insurance claim evaluation, and appraisal practice, and is applied consistently irrespective of the party retaining his services.