



Gerald L. Richardson
Managing Director

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EDUCATION

B.S., Accountancy with Honors,
University of Illinois at
Urbana/Champaign

ACTIVITIES AND HONORS

CPA - Illinois, May 1986
Certified in Financial Forensics by
the American Institute of
Certified Public Accountants –
July 2008
Chartered Global Management
Accountant – December 2014
Member - American Institute of
Certified Public Accountants
Member - Illinois CPA Society
Member of Board of Directors
and Vice Chairperson –
Illinois Legal Aid Online
Associate Member – American
Bar Association

Mr. Richardson is located in The Claro Group's Chicago office and is a member of the firm's Disputes, Claims and Investigations practice. Jerry has over 28 years of professional experience, and has specialized in providing consulting services to clients involved in complex litigation and insurance claims since 1991. He has testified during bench trials, jury trials and depositions and made presentations during settlement deliberations, arbitration hearings and mediation proceedings. Jerry has analyzed damage calculations with a cumulative value exceeding \$1 billion.

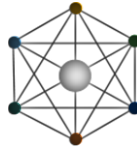
Mr. Richardson has acted in the capacity of an arbitrator to resolve post-transaction purchase price disputes involving the sale of a manufacturing company, a consumer products company and a professional sports franchise. He has served as a senior member of engagement teams retained by corporations and audit committees of boards of directors to perform investigations regarding financial reporting issues in response to regulatory investigations and whistle blower allegations. Mr. Richardson has also presented findings to the Securities and Exchange Commission.

Jerry has extensive experience in the development and preparation of first-party property damage and business interruption claims as well as malicious product tampering, fidelity/employee crime, contractor's all risk, builder's risk, ocean marine cargo and product recall insurance claims. Jerry also has also led teams analyzing policy allocation issues regarding insurance coverage for long-tail asbestos, pollution and human health claims ("APH claims"). He has assisted clients in virtually all aspects of the insurance claims process, such as damage quantification, insurance policy analysis, and the development of negotiating strategies. Jerry has served clients in the agricultural, automotive, retail, professional services, financial services, energy, telecommunications, consumer products, commercial airline, advertising, publishing, real estate, sports and recreation, healthcare, metals and mining, pharmaceutical, construction and manufacturing industries.

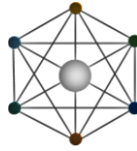
Mr. Richardson's clients are comprised primarily of companies headquartered in the United States and his responsibilities have included quantifying claims and disputes involving operations in Abu Dhabi, Amsterdam, Belgium, Brazil, Canada, Dominican Republic, Guatemala, Luxemburg, the Netherlands, Thailand, United Kingdom and Venezuela. Prior to joining The Claro Group, Jerry was one of 25 founding managing directors of Huron Consulting Group and, prior to his tenure at Huron, a partner at Arthur Andersen. He began his career in Arthur Andersen's Commercial Audit Division, auditing financial statements of multi-national public companies and performing other financial accounting-centric consulting services (e.g., due diligence investigations).

Expert Witness Experience

- Prepared report and testified in deposition and jury trial regarding analysis of plaintiff's damage claim and efforts to mitigate damages in a breach of contract claim. Steel distributor plaintiff alleged that original equipment manufacturer ("OEM") defendant was contractually obligated to purchase cold-rolled steel coils and was liable for the difference between prices contained in various purchase orders and actual price received when plaintiff sold approximately five month supply of cold-rolled steel coils at issue to a steel service center in one transaction. Analysis included calculation of reasonable market prices a similarly situated OEM would reasonably have been willing to pay had the plaintiff demonstrated reasonable care to mitigate damages in disposing of steel at issue. Jury awarded damages to plaintiff within the lowest quartile of range of damages defined by experts.



- Testified in deposition and bench trial regarding analysis of present value of overriding royalties on future coal mining operations presented in calculation prepared by plaintiff's expert witness. Critiqued plaintiff expert's assumptions regarding appropriate royalty rate and pricing. Also, identified differences between tons of coal to be mined in the future used in calculation prepared by plaintiff's expert and tons of coal expected to be mined by mining company management as presented in contemporaneous documents. Differences were due to, among other items, plaintiff's expert ignoring areas with poor mining conditions and differences between historical operating yields per acre and yields presented in third-party mining engineering reports. Court's decision is pending.
- Prepared report to present results of analysis performed to evaluate plaintiff's calculation of damages allegedly suffered by supplier attempting to outsource manufacturing of electric motors to a subcontractor based in China. Defendant terminated supply contract with plaintiff because supplier failed to supply adequate quantities of motors satisfying performance criteria set forth in contract. Calculated value of defendant's counterclaim for increased costs incurred by defendant. Parties settled after report was issued, prior to deposition.
- Prepared report and testified in deposition regarding damages suffered and unjust enrichment enjoyed by defendant resulting from breach of contract and misappropriation of Trade Secrets.
- Prepared report and testified in deposition as rebuttal witness to insurance company's damages expert regarding analysis prepared to calculate "actual cash market value" of therapeutics drug and resulting insurance claim value of loss suffered by policyholder. Insurer did not call damages expert to testify at trial. Jury awarded policyholder damages within 10 percent of amount calculated in analysis.
- Prepared direct and rebuttal reports to quantify lost profits in matter resolved through international arbitration. Dispute related to a failed outsourcing of a pet food manufacturer's European warehousing and distribution functions and related software implementation. The parties negotiated a settlement prior to deposition or arbitration hearings regarding damages.
- Prepared report to quantify limited partnership plaintiff's damages in litigation matter involving allegations of defective design and defective construction of a 700 unit residential apartment complex by the development and construction company defendant. Case specific complexities included consideration of impact of Hurricane Katrina on plaintiff's ability to mitigate, repair schedule and New Orleans market residential rental rates. Parties settled after report was issued, prior to deposition.
- Prepared report at request of counsel to defendant regarding valuation of distribution business. Valuation was required after defendant exercised a contractual right to terminate its Agreement allowing plaintiff to distribute defendant's products. Parties settled after report was issued, prior to deposition.
- Prepared report and testified at arbitration hearing (on a pro-bono basis) regarding damages on behalf of claimants pursuing compensation from the

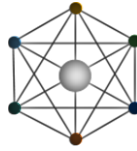


September 11, 2001 Victims Compensation Fund in accordance with Public Law 107-42 and final regulations issued by the United States Department of Justice and Fund Special Master issued March 7, 2002.

- Prepared report in arbitration matter filed with the American Arbitration Association quantifying damages suffered by plaintiff as a result of failed hardware and software implementation. Calculation of damages included components representing costs associated with the failed implementation as well as unrealized efficiencies identified in proposal prepared by defendant. Parties settled after report was issued, prior to deposition.
- Prepared report and provided deposition testimony regarding the methodology used to calculate overhead rates on internal labor used to perform clean-up and repair of property damage and valuation of inventory under the terms and conditions of a property insurance policy. The policyholder did not purchase business interruption insurance. Parties settled prior to trial.

Specific Case Experience

- Fireman's Fund Insurance Company v. Genzyme Corporation. United States District Court – District of Massachusetts. Civil Action No. 93-12776-NG. Palmer & Dodge LLP, One Beacon Street, Boston, Massachusetts, 02108.
- Engineered Products, Inc. and Martek Holdings, Inc. d/b/a MASCON. Arbitration Proceeding 51 117 0040397. Susman, Schermer, Rimmel & Shifrin, L.L.C., Tenth Floor, Aragon Place, 7711 Carondelet Avenue, St. Louis, Missouri, 63105.
- Aurora Bearing Company and ABC Limited Partnership v. Wausau General Insurance Company. Docket No. LK 98 316. Rooks Pitts, 10 South Wacker Drive, Chicago, Illinois, 60606.
- Acxiom Corporation v. Oak Brook Electric Company. Docket No. 2002 L000275. Freeborn & Peters, 311 South Wacker Drive, Suite 3000. Chicago, Illinois, 60606.
- Peerless-Winsmith, Inc. v. Fairfield Manufacturing Company, Inc. Court of Common Pleas Franklin County, Ohio, Case Number 04CVH-02-1769 Chester, Willcox & Saxbe LLP, 65 East State Street, Suite 1000, Columbus, Ohio 43215-3413
- Arthur Andersen, LLP vs. Federal Insurance Company, and Certain Underwriters at Lloyds, London and Certain London Market Insurance Companies. Superior Court of New Jersey, Middlesex County Law Division, Docket Number MID-L-2809-03. Dickstein Shapiro Morin & Oshinsky, LLP, 1825 Eye Street NW, Washington, District of Columbia, 20006-5403
- CG Multifamily-New Orleans L.P., Plaintiff, v. Greystar Development & Construction, L.P., et al. District Court, 162nd Judicial District, Dallas County, Texas. Cause No. 04-11536-I. Winstead Sechrest & Minick P.C., 5400 Renaissance Tower, 1201 Elm Street, Dallas, Texas 75270.
- American Environmental Container Corp., et al v. Lexington Insurance Company, et al. Circuit Court of the Tenth Judicial Circuit in and for Polk County, Florida. Case No. 53-2005-CA-000883. Gray Robinson, One Lake Morton Drive, Post Office Box 3, Lakeland, Florida, 33802.



- George W. Rector, et al. v. White County Coal, LLC, et al. Circuit Court for the Second Judicial Circuit, White County, Illinois. Case No.: 06-L-15. McGuire Woods LLP, 77 West Wacker Drive, Suite 4100, Chicago, Illinois, 60601.
- Metal One America, Inc. v. Republic Storage Systems, LLC. Circuit Court for the County of Cook. Docket No. 2007L011418. Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois, 60654.
- CentiMark Corporation, Plaintiff, v. Tecta America Corp., Vincent J. Vitek, and Patrick J. Hansen, Defendants In the United States District Court For the Northern District of Illinois Eastern Division. Case No. 1:08cv7323. Wildman Harrold Allen & Dixon LLP, 225 West Wacker Drive, Chicago, Illinois, 60606.
- Culligan International Company v. DSC Logistics, Inc. In the Circuit Court of Cook County, Illinois, County Department, Law Division. Case No. 2008 L 006049. Winston & Strawn, LLP, 35 West Wacker Drive, Chicago, IL 60601-9703.
- Praxair, Inc. v. Detroit Bulk Storage, Inc., and Morton Salt, Inc., and U.S. Steel Corporation v. Detroit Bulk Storage, Inc. State of Michigan In the Wayne County Circuit Court. Case No.12-012916-NZ. Clark Hill PLC, 500 Woodward Ave., Suite 3500, Detroit, MI 48226.
- James Turnell and Winward Roofing & Construction, Inc. v. CentiMark Corporation, In the United States District Court For the Northern District of Illinois Eastern Division. Case No. 13-CV-02660. Steptoe & Johnson LLP, 115 South LaSalle Street, Suite 2100, Chicago, Illinois, 60603.