

IN THE COURT OF COMMON PLEAS
BUCKS COUNTY, PENNSYLVANIA

- - -

MICHAEL C. PINTO : NO. 2011-07041-32

v. :

PISANI BUILDERS :
ASSOCIATES, INC. :

v. :

ZRJ CONSTRUCTION, LLC and :
ANDERSEN WINDOWS, INC., :
et al. :

- - -

Doylestown, Pennsylvania
April 16, 2014

- - -

Deposition of CHRISTOPHER R.

PISANI, held at the BUCKS COUNTY COURTHOUSE, 55 East
Court Street, on the above date at 9:10 a.m., before
Dolores M. DeFilippis, RPR-CM-CSR.

- - -

FrontinoReporting, LLC

Frontino/DeFilippis Court Reporting Agency
34 North Front Street
Philadelphia, Pennsylvania 19106
(215) 922-2133
www.frontinoreporting.com

APPEARANCES :

DAVIS BUCCO
BY: DAVID S. MAKARA, ESQUIRE
10 East 6th Avenue - Suite 100
Conshohocken, Pennsylvania 19428
(610) 238-0880
dave.makara@davisbucco.com
Attorneys for Plaintiff

WEBER, KRACHT & CHELLEW, P.C.
BY: RICHARD C. HOWARD, JR., ESQUIRE
847 West Market Street
Perkasie, Pennsylvania 18994
(215) 257-5114
rhoward@wkclaw.net
Attorneys for Pisani Builders
Associates, Inc.

MONTGOMERY, McCRACKEN,
WALKER & RHOADS, LLP
BY: CHRISTOPHER SCOTT D'ANGELO, ESQUIRE
123 South Broad Street
Philadelphia, Pennsylvania 19109
(215) 772-7397
cdangelo@mmwr.com
Attorneys for Andersen Windows, Inc.

MARGOLIS EDELSTEIN
BY: DONALD M. DAVIS, ESQUIRE
170 S. Independence Mall West
Suite 400E
Philadelphia, Pennsylvania 19106
(215) 931-5813
ddavis@margolisedelstein.com
Attorneys for ZRJ Construction, LLC

CURTIN & HEEFNER
BY: JOHN J. HART, ESQUIRE
250 North Pennsylvania Avenue
Morrisville, Pennsylvania 19067
(215) 736-2521
jjh@curtinheefner.com
Attorneys for Brighton Exteriors, Inc.

APPEARANCES (Cont'd):

SANDLER & MARCHESINI, P.C.
BY: GREGORY MARCHESINI, ESQUIRE
1500 Walnut Street - Suite 2020
Philadelphia, Pennsylvania 19102
(215) 568-9300
gmarchesini@sandler-marchesini.com
Attorneys for KS Greenday, Inc.

LAW OFFICES OF RAYMOND A. SWAN
BY: JAMES R. ANDRZEJEWSKI, ESQUIRE
401 Penn Street - Suite 100
Reading, Pennsylvania 19601
(610) 320-4780
james.andrzejewski@cna.com
Attorneys for Moon Landscaping, Inc.

FALLON VAN HORN, LLC
BY: JOSEPH F. VAN HORN, JR., ESQUIRE
30 South 15th Street - Suite 600
Philadelphia, Pennsylvania 19102
(215) 864-6400
jvanhorn@fallonvanhorn.com
Attorneys for Exterior Walls, Inc.

WEBER, GALLAGHER, SIMPSON,
STAPLETON, FIRES & NEWBY, LLP
BY: NICHOLAS J. GOLDWYN, ESQUIRE
2000 Market Street - Suite 1300
Philadelphia, Pennsylvania 19103
(215) 519-4984
ngoldwyn@wglaw.com
Attorneys for Fedele & Sons, Inc.

MARSHALL. DENNEHEY, WARNER,
COLEMAN & GOGGIN
BY: R. ANTHONY MICHETTI, ESQUIRE
10 North Main Street - 2nd Floor
Doylestown, Pennsylvania 18901
(267) 880-2030
ramichetti@mdwgcg.com
Attorneys for Ted Marks t/a Ted
Marks Construction

- - -

I-N-D-E-X

EXHIBIT	DESCRIPTION	PAGE
Pisani-1	Green Valley Group photograph	86
Pisani-2	Photographs Bates stamped Pisani 835 through Pisani 913	100
Pisani-3	Andersen Windows Limited Warranty Bates stamped AW-0001 through AW-0003	198

- - -

QUESTIONING BY	PAGE
MR. D'ANGELO	6, 185
MR. MAKARA	18, 202
MR. HART	84, 211
MR. ANDRZEJEWSKI	107, 213
MR. VAN HORN	124, 215
MR. DAVIS	154
MR. MICHETTI	163
MR. GOLDWYN	172, 216
MR. MARCHESINI	179

- - -

I-N-D-E-X (CONT'D.)
REQUESTS FOR PRODUCTION

PAGE/LINE

83/18

117/19

159/21

203/25

- - -

1 L. Orkowski, Jr.

2 (It is stipulated by and
3 between counsel for the respective parties that
4 sealing, filing and certification are waived and
5 that all objections, except as to the form of the
6 question, are reserved until the time of trial.)

7 - - -

8 LUDWIG J. ORKOWSKI, JR.,
9 4249 H Street, Philadelphia, Pennsylvania, 19124,
10 after having been first duly sworn, was examined
11 and testified as follows:

12 - - -

13 MR. WEINBERG: This is Marc
14 Weinberg, counsel for plaintiff in this matter.

15 I spoke to counsel prior to
16 the deposition commencing. And my request was
17 that I receive a copy of the medical records with
18 regard to Ms. Johnson's prior medical treatment
19 before the date of loss. Counsel was kind enough
20 to advise that he would be speaking to
21 Mr. Fowler, the attorney responsible for the
22 file, to inquire as to the status.

23 I do need those records and I
24 have made numerous requests for them. I would
25 request those records at a point in the near

1 L. Orkowski, Jr.
2 future and do not wish to file a motion with
3 regard to those requests. So, if they can be
4 provided as soon as practicable, I would really
5 appreciate it.

6 I'm not objecting to the
7 deposition today, but I am asking that those
8 records be provided on a timely basis. Thank
9 you.

10 EXAMINATION

11 BY MR. TARANTO:

12 Q. Okay. Mr. Orkowski, am I saying that
13 correctly?

14 A. Uh-huh.

15 Q. Okay. We're going to go through some
16 of the preliminary instructions right now.

17 First, have you ever given
18 deposition testimony before?

19 A. My -- not in a room. If you call
20 going to court --

21 Q. Okay. So, you've given court
22 testimony before?

23 A. Yes.

24 Q. So, you're somewhat familiar with how
25 all this will go down.

SUBCONTRACTOR GUIDELINES

Format

- 25 lines per page with header on line one, or, 24 lines of text with running header.
- Transcripts in the following order: caption page will be page one, appearance page to follow, then the index page(s). **Errata and witness cert are produced by us in-house. Please do not include these pages as part of the transcript.**

- Our footer at the bottom of each page:

FrontinoReporting, LLC

- Our company name at the bottom of the caption page:

FrontinoReporting, LLC
Frontino/DeFilippis Court Reporting Agency
34 North Front Street
Philadelphia, Pennsylvania 19106
215 922-2133 215 922-2910 Fax
www.frontinoreporting.com

Transcript Turnaround

- Regular – 10 business days.
- Expedited – 5 business days.
- Daily – Next day.

Transcript Production and Delivery

- All production will be handled by our office. Transcripts should be e-mailed to **transcripts@frontinoreporting.com** in ASCII format for receipt by us at least two days before they are due.
- Please deliver all exhibits via UPS to our North Front Street office. Exhibits must be sent via our UPS account. FrontinoReporting does not reimburse for shipping. Call office to have shipping label e-mailed to you and discuss type of delivery.
- Our office will make copies of all exhibits to be attached. **(If exhibits left with the reporter are original exhibits, please contact our office for delivery instructions).**
- Read and sign will be handled by our office.
- Any and all dealings with client before and after conclusion of the deposition will be handled by this office. Do not contact our client.
- If the transcript is ordered on a rush basis at the deposition, please notify this office immediately so that we can work out timely delivery to client.

Billing

- Please send your invoice to billing@frontinoreporting.com Our office will invoice all parties.