

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA. 17120

Dear Secretary Chiavetta:

Below please find our response to Pennsylvania American Water Company answer and new matter to our Formal Complaint Docket No. C-2023-3041252

1. Agree

2. Agree

3. Agree

4. Agree

5. Agree IN PART. We agree there was a water main break on June 15, 2021, flowing onto our property and causing damage turned the matter over to their insurance carrier after repair. We DO NOT agree with their denials. Discussions DID take place with the named company representatives in our Complaint. Water Infiltration into our property was VERIFIED by company testing multiple times as Pennsylvania American Water Company Non-revenue water and the infiltration CONTINUES to date, as reported by us to Pennsylvania American Water and VERIFIED by the Company's Field Supervisors named in our Complaint. The Company was NOT ABLE TO LOCATE infiltrating leaks to our property after many months and multiple line digs in 2021 thru 2022 prompting the Company to cap portions of water lines at the shut offs as THEY WERE NOT ABLE TO LOCATE THE LINES. Other line leaks were detected but the exact location for repair was NOT FOUND. I was informed by Company representatives, named in our Complaint, that an emergency total line repair was initiated to take place in mid-2024. We NEVER alleged in our Complaint that our service pipe line was leaking. The leaking lines referred in our Complaint are PAWC lines NOT located ON our property, which is the sole responsibility of PAWC to repair. The Company, through discussions with named PAWC Supervisors in our complaint, and Travelers Insurance Company, their insurer, were provided information of estimates of on-going PAWC Non-revenue water infiltrating and damaging our property. The Company is NOT without information regarding the health issues caused by MOLD growth caused by the continual, long

term water infiltration caused by PAWC aged leaking lines.

6. Agree IN PART. Agree there was a water main break on June 15, 2021. We DISAGREE with the Company denial of water infiltration. April 4, 2022, PAWC Supervisor visited property for continuing water infiltration he VERIFIED TESTED ON SITE as PAWC non-revenue water. Follow up with May 2022 PAWC lab testing which CONFIRMED PAWC non-revenue water was STILL infiltrating our property causing extended damage. The PAWC performed three separate dig sites to try to locate leaking lines without confirmation. September 2022 with FAILED attempts to locate their leaking lines they eliminated portion of their water line with no avail to stopping the continuing infiltration of PAWC non-revenue water into our property causing further property damage. Again, we state we have NEVER alleged that our service pipe was the result of water infiltration. It is the sole result of PAWC leaking, aged lines not located on our property that is the cause of damage.

7. Agree

8. Agree

9. Agree

10. Agree

11. Agree

12. Noted

13. Agree in part. The engineer just "looked" and took photos at water and did no qualifying test for origin.

14. Disagree. PAWC has failed to properly located and repair their aged, leaking lines causing PAWC Non-revenue water from infiltrating our property causing on going damages.

15. Noted

REQUEST FOR RELIEF - Ronald and Sheila Derian respectfully request that your Honorable Commission DO NOT dismiss our Complaint and move forward with the Formal Complaint process.

Respectfully submitted,

Ronald and Sheila Derian

Exhibit 1



From: Sheila Derian Sam\_rjd@yahoo.com  
Subject: PAM non-revenue water leak causing damages and health concerns @  
20 E. Miller Avenue Munhall PA 15120  
Date: Apr 13, 2023 at 3:01:43 PM  
To: ruben.e.rodriguez@amwater.com

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Dear Mr. Rodriguez:

I am writing this e-mail with great concern and deep regret for the seemingly continued neglect of PAM to properly correct the known, test verified, PAM non-revenue water leak infiltrating into my property @ 200 E. Miller Avenue and 06/15/21 flooding by burst water main creating contaminated water causing injury and damage to our health and property for this long extended period of time.

PAM efforts of capping a portion of the line in September 13, 2022 did NOT resolve the leak issue as was reported to and observed by your field supervisor, Shane, [412-508-6422](tel:412-508-6422). We are experiencing significant, CONTINUAL infiltration into our foundation of test verified non-revenue PAM water to date, 04/12/23. For the past week our area has had no rain with higher than normal temperatures. The mold growth caused by the PAM water source is prolific! The foundation deterioration has increased causing further structural damages to our home.

The MOLD growth created by the extreme volume of contaminated water flooding into our foundation and home during the water main break on 6/15/21 and the continued PAM non-revenue water infiltration has severely, negatively impacted our health and home. MOST concerning is my husband's lung infection contracted from this MOLD exposure in 2021, confirmed by medical testing 09/2022, has now spread to BOTH lungs, confirmed by follow-up testing on 03/2023. THIS IS A MOST SERIOUS MATTER OF EXTREME CONCERN.

I was assured by PAM Customer Advocate, Carol, and Lutecia, New Jersey PAM [877-908-2666](tel:877-908-2666) @ 3:00 pm 08/23/22, that an expedited claim was sent to Travelers Insurance on 08/02/22 detailing the MOLD, increased water infiltration, and foundation, structural damage. Another expedited claim for another occurrence of significant water infiltration, MOLD GROWTH, foundation and structural damage, was sent to Travelers on 09/23/22. These claims have NOT been acknowledged to me by Travelers. They are additional separate claims from the one filed by PAM to Travelers on 06/15/21.

I received a response from Travelers Insurance on 01/19/23 (19 months after DOL) and an e-mail on 04/13/22 (10 months after DOL) both containing inaccurate information and the TOTAL lack of addressing ANY of the above serious issues and two separate claims dating 08/02/22 and 09/23/22. Carol, Customer Advocate, PAM, ASSURED me on 10/03/22 that all information of the 06/15/21, 08/02/22 and 09/23/22 dated claims were sent to Local and the Loss Departments of PAM to timely address and forwarded this information to your insurer.

Your professional attention to this most grievous matter would be appreciated.

Thank you,  
Sheila Derian  
200 E. Miller Avenue  
Munhall, PA. 15120  
[412-969-3311](tel:412-969-3311)

From: Sheila Derian Sam\_rjd@yahoo.com  
Subject: PAM non-revenue water infiltration and damage, 200 E. Miller Avenue,  
Munhall, PA 15120  
Date: Jan 6, 2023 at 9:20:26 AM  
To: ruben.e.rodriguez@amwater.com

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This e-mail is an update of my e-mail of 12/22/22.

I have received an automatic response from your office on 12/22/22 informing you will be out of your office from Dec. 21-27, 2022 and will return e-mails upon your return to the office. You have failed to respond to date. This confirms to me that you are indeed receiving my e-mails and you are indeed choosing to not respond.

1. PAM test verified non-revenue water from leak in PAM water line is STILL aggressively infiltrating my home's foundation further damaging property.
2. Mold is STILL propagating due to the damp wet conditions created by the water infiltration causing multiple problems.
3. PAM insurer, Travelers Insurance Company, has not contacted me concerning claims filed by PAM as stated by PAM Customer Advocate Department.

Sheila Derian  
200 E. Miller Avenue  
Munhall, Pa. 15120

Sent from my iPhone

From: Sheila Derian Sam\_rjd@yahoo.com  
Subject: PAM case #1053495918  
Date: Dec 22, 2022 at 10:35:02 AM  
To: ruben.e.rodriguez@amwater.com

Rueben Rodriguez:

This is an update of my e-mail of 12/6/22, to which you have failed to respond. As the contact representative for Mike Doran, current President of PAM and Cheryl Norton, PAM COO, I have requested you are making them aware of these most serious issues per my previous e-mails to you.

1. PAM has contracted CCSI to replace Hill Street pavement beginning on 12/21/22 and continuing today 12/22/22, where work to try to stop the aggressive infiltration of PAM non-revenue water into my home's foundation has been performed. Unfortunately, on 12/21/22 when CCSI began work, shortly thereafter an ambulance was called to the worksite for a medical emergency and treatment by medical personnel. Shortly following the arrival of the ambulance, the disgusting act of a CCSI employee occurred as he exposed himself by his utility vehicle parked on the side of my property and relieved himself by urinating in my yard! I witnessed this disgusting act as I was pouring a cup of coffee by my kitchen window. Notably upset, I immediately went outside to my yard and notified the CCSI employees that this indecent act of public urination will not be tolerated and will be reported. I feel it is your responsibility, as CCSI is working for PAM, that this incident will be seriously addressed by your company ASAP and necessary action taken.
2. The PAM non-revenue water is still aggressively infiltrating my home.
3. Mold from conditions continuing from the PAM non-revenue water is still proliferating it's growth.
4. Your insured, Travelers Insurance Company, has not responded to claims.

Your response to these MOST serious issues is expected.

Sheila Derian  
200 E. Miller Avenue  
Munhall, PA. 15120

Sent from my iPhone

From: Sheila Derian Sam\_rjd@yahoo.com  
Subject: PAM non-revenue water infiltration  
Date: Dec 6, 2022 at 7:13:24 AM  
To: ruben.e.rodriguez@amwater.com

Rueben Rodriguez:

You have not responded to my e-mail of 11/18/22. This is an update.

- 1). Test verified PAM non-revenue water is still aggressively infiltrating the foundation into my home. See attached photo.
- 2). The rapid mold growth is continuing due to wet damp conditions created by PAM non-revenue water infiltration.
- 3). Your insurer, Travelers Insurance Company, has not contacted me concerning these issues.

Sheila Derian  
200 E. Miller Avenue  
Munhall, Pa. 15120

From: Sheila Derian Sam\_rjd@yahoo.com  
Subject: PAM non-revenue water damage  
Date: Nov 18, 2022 at 4:04:09 PM  
To: ruben.e.rodriguez@amwater.com

ATTENTION: Ruben Rodriguez, Senior Director, External Communications  
American Water

This e-mail is a follow-up to my phone calls to your office on 10/28/22, 10/14/22, 9/28/22, and 9/23/22 concerning property and personal loss caused by PAM non-revenue water infiltrating my home over an extensive period of time.

Most recently, on November 2, 2022, I alerted PAM to the significant increased infiltration of test verified PAM non-revenue water through our foundation into our home. Hundreds and hundreds of gallons of your non-revenue water have been pumped out of our home, as has been witnessed by PAM field workers, and continues to date. It is paramount that PAM locate and repair this line leaking to abate this infiltration into my home and stop the continuation of its destruction to my property.

PAM Field Supervisor, Shane, while inspecting property on 9/13/22, noted the continued infiltration of water into our home after completion of capping part of the Hill Street water line. PAM was not able to locate this line even after digging down 13ft. in reference to the line blueprints, so they capped off that section creating a dead line with no water flow to try to address the non-revenue water infiltrating into my home. Unfortunately, as stated above, the infiltration is continuing after the line capping which directs this problem as occurring yo another line leak. The Field Supervisor indicated PAM would take additional steps to locate and repair the leak. To date, no such action has taken place.

As a result of the above, additional foundation movement occurred on November 10, 2022 due to the continual infiltration of the PAM non-revenue

water. The continued wet, damp conditions occurring from this water is amplifying the mold growth and contamination.

As has previously been demonstrated in the past, in 2018, 2019, and 2021, this increased infiltration will most likely be followed by an eventual surface rupture of the line which will THEN be repaired by PAM.

PAM has submitted third party claims to your insurer, Travelers Insurance, for damages and loss to our property on August 2, 2022 and September 23, 2022 due to the ongoing infiltration of PAM non-revenue Water. Neither claim has been acknowledged to us by Travelers Insurance. It is now well past the 30 days Pennsylvania REQUIRES insurance companies to notify third party claimants WRITTEN confirmation of a submitted claim.

Your response and notification to all parties concerned to assist in this most serious matter is appreciated.

I have noted the announcement on October 31, 2022, that Mike Doran, currently the president of PAM, has been named Deputy Chief Operating Officer at American Water reporting to Executive Vice President and COO Cheryl Norton. Additionally, Justin Ladner, currently serving as president of Illinois American Water, has been named president of American Water. Cheryl Norton COO of American Water has stated, "She is excited to see the company promote these experienced employees. They know how to build teams effectively and THEY UNDERSTAND THE IMPORTANCE OF PUTTING OUR CUSTOMERS FIRST while making the communities we serve stronger." Perhaps, as you are the contact person for these new PAM leaders, making them aware of this serious problem and requesting their input on this matter would be of great value in reaching a resolve to our loss of more than

\$285,162.38 plus in damages incurred to my home due to the continued infiltration of PAM non-revenue water.

Confirmation of receipt of this e-mail is appreciated.

Respectfully,

Sheila Derian  
200 E. Miller Avenue  
Munhall, PA. 15120-3228  
Phone:: 4129693311

Sent from my iPhone

From: Sheila Derian [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)  
Subject: Fwd: PAM Case #1053495918, Travelers Ins. Claim #FQW2819  
Date: Oct 21, 2022 at 1:25:29 PM  
To: [rachael.anne81@yahoo.com](mailto:rachael.anne81@yahoo.com)

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Sent from my iPhone

Begin forwarded message:

**From:** PAW - Customer Advocacy/AWWSC <[PAW-Customer-Advocacy@amwater.com](mailto:PAW-Customer-Advocacy@amwater.com)>  
**Date:** October 19, 2022 at 8:54:53 AM EDT  
**To:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Subject:** RE: PAM Case #1053495918, Travelers Ins. Claim #FQW2819

Good morning Mrs. Derian,

This message is to confirm that your e-mail was received and has been forwarded to our AW Loss department who will then forward it to Travelers.

Thank you.

-----Original Message-----

**From:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Sent:** Tuesday, October 18, 2022 2:30 PM  
**To:** PAW - Customer Advocacy/AWWSC <[PAW-Customer-Advocacy@amwater.com](mailto:PAW-Customer-Advocacy@amwater.com)>  
**Subject:** Re: PAM Case #1053495918, Travelers Ins. Claim #FQW2819

EXTERNAL EMAIL: The Actual Sender of this email is [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com) "Think before you click!".

ATTENTION: Carol

Good afternoon. It has been over two weeks since Rueben Rodriguez's office has referred the above PAM case to your office for handling. To date there has been no resolution. I phoned Mr. Rodriguez again on 10/14/22 to make him aware the problem has not been addressed with resolution.

- 1) The PAM non-revenue water is still infiltrating my property causing continued damage.
- 2) The MOLD contamination, which cannot be remediated because the source is generated

by the continuance of PAM non-revenue water infiltration into my home.

3) The MOLD colonies have contaminated everything in our living space including the AIR we breath causing serious health issues which have required medical intervention. We have also had to seek veterinarian care for our pet cat who has been suffering from ill effects of the mold contamination.

I would like to know to whom, specifically, this issue was transferred to from your office, and what contact information is available. The "hot potato" transfer of this most serious issue from one office and representative to another within PAM customer service in my opinion is most non-productive.

Your response to the matter would be appreciated.

Thank you,  
Sheila Derian

Sent from my iPhone

On Oct 3, 2022, at 11:52 AM, PAW - Customer Advocacy/AWWSC <[PAW-Customer-Advocacy@amwater.com](mailto:PAW-Customer-Advocacy@amwater.com)> wrote:

Hello Mrs. Derian,

This is Carol and I apologize for not confirming receipt of your email.

Yes your e-mail was received and as we discussed, I forwarded to our Loss Department who works with Travelers as well as our Local office.

I'm waiting to hear back from Local to make sure that they have communicated what's going on to the insurance company and our Loss Department advised that they have forwarded the information to Travelers who should be reaching out to you.

Thank you.

-----Original Message-----

From: Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>

Sent: Monday, October 3, 2022 10:45 AM

To: PAW - Customer Advocacy/AWWSC <[PAW-Customer-Advocacy@amwater.com](mailto:PAW-Customer-Advocacy@amwater.com)>

Subject: PAM Case #[1053495918](#), Travelers Ins. Claim #FQW2819

EXTERNAL EMAIL: The Actual Sender of this email is [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com) "Think before you click!"

ATTENTION: CAROL

This USA follow up to my e-mail sent to you on 9/29/22 in which we discussed the above subject by phone.

I have requested a confirmation of receipt of the 9/29/22 e-mail from you, but to date have not received confirmation.

HAS YOUR OFFICE, specifically, Carol, received my informational e-mail of 9/29/22?

A response is expected.

Thank you,

Sheila Derian

Sent from my iPhone

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## Office 0532

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**From:** RACHAEL anne <rachael.anne81@yahoo.com>  
**Sent:** Monday, October 17, 2022 3:21 PM  
**To:** Office 0532  
**Subject:** [EXTERNAL] Fwd: claim # FQW2819  
**Attachments:** AquaGuard Systems.pdf; Lane Plastering & Stucco.pdf; Renewal (windows).pdf; PODS.pdf

**Caution! This email originated outside of FedEx. Please do not open attachments or click links from an unknown or suspicious origin.**

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <sam\_rjd@yahoo.com>  
**Date:** September 28, 2022 at 3:11:34 PM EDT  
**To:** rachael.anne81@yahoo.com  
**Subject:** Fwd: claim # FQW2819

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Date:** July 20, 2022 at 1:29:52 PM EDT  
**To:** [roravec@travelers.com](mailto:roravec@travelers.com)  
**Cc:** [schnitzer@travelers.com](mailto:schnitzer@travelers.com)  
**Subject:** Fwd: claim # FQW2819

**Date:** July 20, 2022

You have FAILED to respond to my e-mail of 04/14/22 concerning claim #FQW2819. I have requested a copy of the e-mail you stated was sent to me by you on 10/21/21. You also stated per your investigation you were informed by PAM that they had no water leaks on Hill Street line prior to date of loss 06/15/21. I have

spoken to representatives in PAM office and field supervisors who assured me this statement would most likely not have been made to you because it is not factual as proven by viewing their records. What date and with whom did you speak at PAM that gave you this information during your investigation? These events lead me to be of the opinion that you are not acting in good faith concerning this most serious issue. Therefore, I feel compelled to send this e-mail to Alan D. Schnitzer, CEO of Traveler's Insurance Company as well to make him aware of the my unpleasant and fruitless experience with his adjuster concerning Claim #FQW2819.

As a result of the continuing PAM non revenue water infiltration into our homes foundation, on Monday, April 4, 2022, movement of foundation was felt and heard. Upon inspection corner vertical crack on outside of brick was revealed, foundation has a widened crack which has caused space opening to the outside, the foundation block have shifted loose from the home's main steel support beam, roof and peak trim movement, difficulty opening and closing windows due to frame shifting, difficulty in opening and locking patio door, screens in windows cannot be moved, front door difficult to close, lock, and open, plaster crack inside length of kitchen window, crack above sliding patio door has significantly increased by widening and moving across ceiling in kitchen, significant increase of foundation water infiltration, continued shearing and degradation of foundation, water coming up through crack in basement and garage cement floors.

April 5, 2022, 3:30 pm I alerted PAM to the significant increase of water infiltration taking place and an emergency work order #523468582 was generated. PAM field inspector arrived at property @ 5:30 pm, April 5, 2022. He noted the damage mentioned above, took a water sample at site, which was determined to be chlorinated and informed me he would schedule a crew with the proper GPS equipment to locate the leak causing this prominent flow of water.

May 12, 2022, at 2:54 p.m. I called PAM, speaking with Arial, about the April 5, 2022, work order for GPS leak location not being performed to date. I explained that thousands of gallons of non revenue water are still flooding through my foundation into my home. Arial generated another emergency work order #523737583 along with a case #1049201328. She stated all described above was placed in her notes and sent to the back office where she promised the matter would be

addressed promptly. PAM field worker visited property May 12, 2022, 4:30 pm. He viewed issue. Said he will turn issue over to his supervisor, Jason for handling. Gave me supervisor's phone # 412-862-9099 to contact him and explain problem. I did so and explained from beginning of approximately from 11/02/18 when my husband dug a trench to collect and direct the significant flow of water infiltrating foundation blocks to a sump pump to keep water from continual flooding of our already water damaged gameroom furnishings, carpeting, and paneling, basement, and garage. I explained on 02/11/19 when significant increase of water infiltration began causing our sump pump to run 24/7 nonstop to keep up with the water infiltrating until 6/15/21. Water infiltration continues until present date. Jason stated he was turning issue to his supervisor, Jack, for resolution. Jason in collaboration with his supervisor, Jack, stated a PAM work crew would collect water sample from residence, to which I agreed. May 13, 2022, 9:45 a.m. Matt from PAM arrived to collect water sample and take to lab for analysis. He returned at 1:15 pm and ran leak detection devices. He discovered the line with a high detection ping indicating a leak on Hill Street and E. Eugene. He stated he would report this information to his supervisor.

May 17, 2022, 10:30 a.m. PAM work crews arrived and Tom, PAM supervisor, asked for permission to take another water sample, to which I agreed, again tested as PAM non revenue water as previous test on May 13, 2022. At approximately 12:30 p.m. on May 13, 2022, another PAM crew arrived to assist to detect where leak was occurring, but it was not yet located.

May 18, 2022, Shane, PAM supervisor, arrived at our home 10:00 a.m. and requested another water sample for an additional testing to have done at a more elaborate lab, to which I agreed.

May 20, 2022, 10:30 a.m. ,Shane, PAM supervisor called to notify us after multiple testing, the water samples were VERIFIED PAM NON-REVENUE WATER that HAS been and CONTINUES infiltrating our property. He informed me that they will begin digging and leak detection again to try to find and make temporarily repair to stop the significant water flow we are experiencing. The Hill Street entire line replacement project has been placed on an emergency basis which is scheduled to start sometime in mid 2024.

June 7, 2022, 9:00 a.m. PAM work crews have started

work digging on Hill Street to try to find the leak to make a temporary repairs until the water line replacement project starts in 2024. PAM has not been able to locate the water line itself on the lower end of Hill Street to examine for leaks causing their non revenue water from infiltrating through our foundation.

On June 9, 2022, PAM crews did locate and repair a significant leak higher up on Hill Street which was contributing to the foundations infiltration, but it's repair did not end the infiltration of non revenue water through the foundation. They will continue to try to locate the water line on lower Hill Street to check for leaks and repair.

As our home has been negatively affected from PAM water intrusion for a very extended period of time, approximately October 2018 until present, and Travelers' delay from 06/15/2021 to present to remedy these most serious issues, the MOLD growth development has become significantly worsened allowing mold colonies to create which have contaminated our living environment and taking a negative toll on our health with mold exposure symptoms such as headaches, eye irritation, sneezing, itching, skin rashes, which have escalated to breathing disorders, chronic sinusitis, pain in muscles and joints, nausea, diarrhea, earaches, by our CONTINUED exposure to mold over such an extended period of time. This mold problem has been confirmed by having environmental tests of my home conducted by a professional mold remediation company. The mold has contaminated the subfloors and hardwood flooring of our home requiring removal. The mold has contaminated the air ducts requiring professional deep cleaning. Our air must be scrubbed and toxins removed.

Because of the extensive length of exposure to the mold, all organic materials stored in the lower level, clothes, coats, books, draperies, golf bags, stuffed toys, keepsakes, pictures, papers, carpets, bedding, pillows, cabinetry, wood paneling, wooden work shop table and cabinetry have been mold contaminated and dampness rotted wood items are dangerously contaminated by ascospores, aspergillois, basidia spores, cladosporium, pithomyces, smuts, mysomycetes, Stachybotrys, airborne toxins, and have required disposal with an estimated loss of \$29,400.00 (twenty-nine thousand four hundred dollars) and

many items that, to us, are considered IRREPLACEABLE . The main living space level of our home is also contaminated by the above mentioned mold and airborne toxins requiring disposal of clothes, upholstered living room furniture, draperies, carpeting, and bedding, with an estimated loss of \$35,500.00 (thirty-five thousand five hundred dollars).

The foundation of our home is dangerously corrupted from the constant hydrostatic pressure of the non ceasing water flow still occurring to date. All three walls, for which the estimate for repair is included herein, and are now near the point of collapse, opening crack to the outside due to the foundation slip on April 4, 2022, creating a dangerous condition. The estimate for the foundation rebuild is \$85, 850 (Eighty-five thousand eight hundred fifty dollars).

The April 4, 2022, foundation movement has created plumbing leaks in my bathroom and kitchen. The bathroom leak occurred behind the wall creating further mold contamination and need for plaster and tile removal and repair. The cost for repair will be updated due to inflationary costs and forwarded. The kitchen leak has mold contaminated damaged three of our wood cabinetry and deteriorated the wood requiring replacement. The repair estimate will be updated due to inflation costs and forwarded.

The constant and continuing to date hydrostatic pressure from water flow has caused movement and damage to my front steps and driveway, requiring replacement.

The wet and damp foundation condition due to PAM water infiltration has corrupted a natural gas pipe connected to the foundation causing needed replacement by the People's Natural Gas Company for our safety.

The wet, damp, humid conditions created by the PAM water infiltration has caused a biting mosquito presence to occur in and around our home.

The June 15, 2021, extreme volume of flooding produced by a burst water main on Hill Street has contaminated each and every block of my exterior walls with harmful contaminants. Contaminate-laden soil, animal waste, bird droppings, salt, pesticides, oil, fungi, and mold have filled my block wall. Proliferated growth of saplings, , plants, fungi, mold, and heavy moss has been caused by deposits of contaminants during the

flood necessitating the COMPLETE replacement of the walls with added drains under block footer and yard to prevent water flow from reaching homes foundation , not a mere reset of a piece of the wall as Travelers', Rose Horavec, offered. The wall is near collapse posing another hazard along with the health hazard. The estimate for repair, \$49, 465 (Forty-nine thousand four hundred sixty five dollars)is attached.

The estimate for the remediation of the dangerous mold hazard will be updated and forwarded due to inflation costs.

The repair estimate for kitchen ceiling and wall plastering repair, \$2100.00 (Two thousand one hundred dollars), is attached.

The repair estimate for our main roof, which is damaged due to foundation movement will be updated and forwarded due to inflation costs.

The repair estimate for the front porch, steps and driveway, due to shifts and movement caused by hydrostatic pressure and continuing infiltration of the water leak, front porch, \$9,750.00 (Nine thousand seven hundred fifty dollars), front steps \$10, 360.00 (Ten thousand three hundred sixty dollars), driveway \$13, 125.00 (Thirteen thousand one hundred twenty-five dollars), is attached.

The estimate for the repair of the windows, patio door, and front door due to foundation movement caused the PAM water infiltration is \$48, 945 (Forty-eight thousand nine hundred forty-five dollars)which is attached

The estimate for storage pods is \$667.38 (six hundred sixty-seven dollars and thirty-eight cents) which is attached.

The estimate for removing mold contaminated sub flooring and hardwood flooring will be updated due to inflation costs and forwarded .

The quotes submitted last year from Bakers Waterproofing and Franjo Construction are no longer valid due to time elapsed and increased damages and are to be disregarded.

June 9, 2022 PAM water Company called to notify me that one of the leaks was found and temporarily repaired on Hill Street to try to alleviate the water flow into our foundation, but this was to no avail in stopping

the infiltration of water. PAM stated they will continue to try to locate and repair the other leaks that their GPS is relaying until 2024 line replacement project is started.

THE ABOVE MENTIONED DAMAGES TO MY HOME THAT HAVE OCCURRED AND IS STILL OCCURRING DUE TO LAB VERIFIED PAM NON REVENUE WATER INFILTRATION IN AND AROUND OUR HOME AND PROPERTY IS NO LONGER TOLERABLE BY MYSELF AND FAMILY.

THE NEGATIVE IMPACT ON OUR HEALTH AND ADVERSE LIVING CONDITIONS CREATED BY MOLD CONTAMINATION CAUSED BY THE WET AND DAMP ENVIRONMENT CAUSE BY YOUR INSUREDS, PAM WATER COMPANY, NON REVENUE WATER INFILTRATION IS NO LONGER BEARABLE.

THIS SITUATION WITH YOUR INSURED, PAM, WATER INFILTRATION AND TRAVELERS CONTINUED DELAY IN REMEDY TO MAKE OUR LOSS WHOLE AGAIN HAS NEGATIVELY IMPACTED OUR LIVES AND HAS INFRINGED ON OUR PA CONSTITUTIONAL, ARTICLE 1 SECTION 27, RIGHT TO BREATHE CLEAN, NON TOXIC AIR AND INFRINGED ON OUR BASIC PURSUIT OF HAPPINESS IN OUR HOME.

Therefore, we DEMAND Travelers immediate response and payment of our quoted loss , at this time, of \$285, 162.38 (Two hundred eighty-five thousand one hundred sixty-two dollars and thirty-eight cents) to be received within seven days or we will contact legal counsel to assist in recovering our loss caused by your insured, PAM Water Company. Please be advised the above estimate of \$285, 162.38 (Two hundred eighty-five thousand one hundred sixty-two dollars and thirty-eight cents) does NOT include the estimates for repair of main roof, Peoples's Natural Gas Pipe replacement by plumber, removal and disposal of mold contaminated sub flooring , floor install, bathroom wall mold and install, and three mold rotted bottom kitchen cabinets as stated above due to rising inflation costs, and all needed permits required by Munhall Boro.

Any information needed to confirm water damage liability can be affirmed by contacting your insured, PAM Company.

Thank you,

Sheila Derian  
200 E. Miller Avenue

## Office 0532

---

**From:** RACHAEL anne <rachael.anne81@yahoo.com>  
**Sent:** Monday, October 17, 2022 3:21 PM  
**To:** Office 0532  
**Subject:** [EXTERNAL] Fwd: Claim FQW2819 - Pennsylvania American Water

**Caution! This email originated outside of FedEx. Please do not open attachments or click links from an unknown or suspicious origin.**

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <sam\_rjd@yahoo.com>  
**Date:** October 12, 2022 at 1:40:55 PM EDT  
**To:** rachael.anne81@yahoo.com  
**Subject:** Fwd: Claim FQW2819 - Pennsylvania American Water

Sent from my iPhone

Begin forwarded message:

**From:** "Oravec, Rose" <[RORAVEC@travelers.com](mailto:RORAVEC@travelers.com)>  
**Date:** April 13, 2022 at 4:41:45 PM EDT  
**To:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Subject:** Claim FQW2819 - Pennsylvania American Water

Good Afternoon Mrs. Derian,

I apologize for the delay in responding to your email.

As you know, Joe Fagan of Gateway Engineers was retained to inspect your property as a result of the water main break on June 15, 2021. He initially inspected on July 14, 2021. On 9/17/2021 I called you to go over the report - I left you a v/m message. On 10/21/2021 I phoned you again and got your voicemail so I sent you an email that I needed to discuss your claim with you. You called me on 11/3/2021 and I went over the report in detail as to the engineers findings. You disagreed with the report and stated you had on-going issues including further movement and cracking of the items that were initially alleged so I agreed to send the engineer back to go over your concerns with you. He reinspected on November 8, 2021. On December 21, 2021 I called you to discuss his findings and again left you a message.

I have reviewed your March 4, 2022 email and while you allege that the water main had been leaking for months, that is not what our investigation revealed. PAW has no record that this line was leaking prior to the break on June 15, 2021.

As to the engineers findings in his original report:

In summary, it is my opinion, within a reasonable degree of engineering certainty, that the only distresses to the Derian dwelling and property that could be attributable to runoff from the June 15, 2021, PAW water main break is possibly the bowing of the left or east portion of the rear yard retaining wall. Water infiltration into the basement has been occurring for several years as indicated by the need for a trench drain to be installed; the water stains and displaced paint on the basement walls; and, the continuous flow of water in the basement trench drain, about one month after the water main break repair.

During his second inspection he went over with you all the areas of concern. His subsequent report opined:

In summary, it is my opinion, within a reasonable degree of engineering certainty, that none of the distresses to the Derian dwelling and property that were claimed as having occurred since my July 14, 2021, site inspection are new nor the result of runoff from the PAW water main line break that occurred on or about June 15, 2021..

Water infiltration into the basement has been occurring for several years as indicated by: the need for a trench drain to be installed; the water stains and displaced paint on the basement walls; and, the continuous flow of water in the basement trench drain, almost five months after the water main break repair.

As to Travelers intent to handle your claim, we are willing to reset the left portion of the rear retaining wall to bring it to pre-loss condition. No consideration will be given to the estimate from Bakers Waterproofing for installation of an interior French drain nor your estimate from Franjo Specialty to replace the retaining walls nor the entire patio including the roof.

Please contact me at 412-338-3149 to discuss a resolution of the rear retaining wall.

Rose M. Oravec | Claim Professional | General Liability  
Travelers Property Casualty Company of America  
Mid-Atlantic Claim Center  
Pittsburgh  
W: 412-338-3149 F: 1-866-704-2713  
Email: [roravec@travelers.com](mailto:roravec@travelers.com)

Mailing Address:  
Travelers  
PO Box 430  
Buffalo, NY 14240-0430

-----Original Message-----

From: Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
Sent: Tuesday, April 12, 2022 1:49 PM  
To: Oravec, Rose <[RORAVEC@travelers.com](mailto:RORAVEC@travelers.com)>  
Subject: [External] Claim FQW 2819

CAUTION: This email came from outside of Travelers. Please exercise caution when opening attachments, clicking links or responding to this email. The original sender of this email is [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com).

This e-mail is a follow-up to my e-mail inquiry sent on 03/04/22 regarding the above third party claim # FQW 2819 to which I have received no response from Travelers after these thirty days. In my opinion, I believe that due to this excessive delay in responding to the claim, that Travelers is acting in bad faith.

I will be forwarding my concerns and all information previously sent to you to Alan D. Schnitzer CEO of Travelers Insurance to [schnitzer@travelers.com](mailto:schnitzer@travelers.com) for his office's response toward resolving this issue.

Thank you,  
Sheila Derian  
200 E. Miller Avenue  
Munhall, PA 15120  
E-mail: [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)

Sent from my iPhone

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This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

TRVDiscDefault::1201

## Office 0532

---

**From:** RACHAEL anne <rachael.anne81@yahoo.com>  
**Sent:** Monday, October 17, 2022 3:22 PM  
**To:** Office 0532  
**Subject:** [EXTERNAL] Fwd: FQW2819

**Caution! This email originated outside of FedEx. Please do not open attachments or click links from an unknown or suspicious origin.**

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <sam\_rjd@yahoo.com>  
**Date:** September 28, 2022 at 3:09:11 PM EDT  
**To:** rachael.anne81@yahoo.com  
**Subject:** Fwd: FQW2819

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Date:** April 15, 2022 at 5:39:07 PM EDT  
**To:** [roravec@travelers.com](mailto:roravec@travelers.com)  
**Subject:** FQW2819

Dear Rose Oravec:

Thank you for finally acknowledging my e-mail of 03/04/22 by responding on 04/14/22.

In response, I would say Joe Fagan is correct in stating that water infiltration has been occurring for several years. The PAW repair crew addressing the culminating act of a leaking line causing an above ground burst water main on 06/15/21 also had stated to me and my husband that the badly perforated line appeared to have been leaking for a long period of time PRIOR to the surface rupture. Joe Fagan retrieved a piece of the badly eroded water line ( which demonstrated the bad condition of the line) from my property, weighing approximately 15lbs., which was thrust into my backyard along with other debris, by the rushing water on 06/15/21, for his examination.

You state that your investigation revealed there was no record by PAW that the HILL STREET water line was leaking prior to the break on 06/15/21. That is not an accurate statement. Two examples follow: A) 11/19/20 HILL STREET experienced a 6 in. Water main and line break prompting an emergency repair on 11/19/20, after leaking on street since January 2020 causing hazardous ice build up on street during winter. I followed up with complaints to the water company on 02/11/20 of a continuous flow of water

company chlorinated water (confirmed by HACH Chlorine DPD reagent test) in basement, with available dated photo. B) 11/06/20 The corners of HILL STREET and E. Eugene Street experienced a PAW 6 in. Water main and line break, on which date emergency repair was made after prior months of evident above ground leakage went unaddressed. Phone messages from PAW will CONFIRM that there has been prior leaking from HILL STREET water line on multiple dates. On 06/15/21 there was, again, a water main line break on HILL STREET causing massive amounts of water with hundreds of pounds of pressure to pound against my property, home, and foundation, loosening and removing foundation material creating an unsafe foundation to my home, causing destabilization of my hillside behind my home, wall damage, immense amounts of water penetrating under my patio causing serious damage cracking concrete, landscaping damage, yard sinkage, interior damage, and MOLD (Joe Fagan notes displacement of paint on basement wall, which was attributed from our scrubbing of wall to mitigate mold growth) which is known to cause serious health issues from exposure.

You state you e-mailed me on 10/21/21. I have no record of your e-mail. Please send copy of that e-mail for confirmation of your statement.

Joe Fagan states in his original report of July 14, 2021, you provided, "that water infiltration with a continuous flow of water was still occurring about one month after the water main break repair." That is incorrect. Approximately 5 days after the water main repair, the fast, flooding, significant water flow ceased. There was no "continuous flow of water" on July 14, 2021, as stated by Joe Fagan. There was very minimal water filtrating in from a natural pathway created by the several days long water surge from the PAW water line break. I have dated pictures confirming this no glowing water. Even through the '100 year rain event' on August 31, 2021, as documented by NOAA, our basement suffered very minimal water infiltration.

During his second inspection on November 8, 2021, per my request and your agreement during my November 3, 2021 phone call to Travelers, I directed Joe Fagan's attention to the side basement foundation of our home where I discovered water infiltrating on October 14, 2021. I expressed my deep concern about the main and water line on HILL STREET directly adjacent to the present water infiltration site in my home that it might completely burst like the other parts of the HILL STREET line had, as documented above, causing further severe damage to my property as it did on 06/15/21. He reiterated, as you have previously stated to me, that Travelers cannot compel PAW to check or dig up their lines. In my opinion, having information and history to perhaps prevent another negative event from occurring again and not acting upon it, borders on the side of negligence.

From approximately 06/21/21 until October 13, 2021, our basement foundation experienced NO significant water flowing; only infrequent, very minimal water, from a natural pathway created as described earlier. October 14, a noted change of increased water infiltration of the side foundation was observed.

I disagree with Joe Fagan's report of no new damage on his November 8, 2021 visual inspection.

I maintain all damages and estimates submitted for payment, thus far, are the responsibility of Travelers Insurance Company and your insured, Pennsylvania American Water Company.

Respectfully,  
Sheila Derian  
200 E. Miller Avenue  
Munhall, Pa. 15120  
E-mail: [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)  
Sent from my iPhone

From: Sheila Derian sam\_rjd@yahoo.com  
Subject: Fwd: Property damage @ 200 E. Miller Ave., Munhall, PA 15120  
Date: Oct 21, 2022 at 1:29:55 PM  
To: rachael.anne81@yahoo.com

Sent from my iPhone

Begin forwarded message:

From: Sheila Derian <sam\_rjd@yahoo.com>  
Date: September 29, 2022 at 2:59:22 PM EDT  
To: PAW-Customer-Advocacy@arcwater.com  
Subject: Property damage @ 200 E. Miller Ave., Munhall, PA 15120

ATTENTION: CAROL

Attached is the most recent contact with PAM per text. The attempted resolve of the stated issue is as follows:

September 12, 2022

PAM work crews arrived 9:00 am to dig up Hill St. water line and cap, placing shut off valves, to eliminate lower portion of leaking Hill St line infiltrating our foundation. Crews left approx. 9:00 pm

September 13, 2022

PAM work crews returned @ 9:00 am to continue work eliminating leaking lower portion of Hill St. water line. They dug up end section, capped line and installed valves. The fire hydrant on E. Miller Ave. was opened and used to flush water from discontinued portion of deteriorated water line.

September 21, 2022

I texted Shane, PAM supervisor, as per his request, to update him on water infiltration progress after 7 days of capping lower section of leaking Hill St. line. I stated side foundation wall has had no water flow since line capping. However, the back foundation wall is still being infiltrated same as when he observed on 9/13/22. Mold generated by these conditions has become a grave concern of ours. I stated Travelers, your insurer, has not contacted me since PAM submitted the claim asked if he could direct me to a supervisor who is handling this issue for resolve.

cricket LTE

2:07 PM



Shane-PAM >

iMessage

Mon, Aug 29, 11:29 AM

Hi Shane,  
This is Sheila Derian,



Shane-PAM ▾



audio



FaceTime



info

Hi Shane,  
This is Sheila Derian, 200 E. Miller Avenue, Munhall. We have had foundation movement today, August 27, 2022, which has been the most significant to date. This is what followed the foundation movement: Water infiltration has increased. This leads me to believe that the undetected water line leak has worsened significantly. The ceilings vibrated causing our chandelier crystals to shake for a few seconds accompanied by alarming loud cracking and banging sounds throughout the house. Our foundation block has separated from our main support beam in the basement. The basement stairs have shifted slightly to the left. The backyard walls bottom block has been completely pushed out of the wall, likely from hydrostatic pressure. Three large cracks in our yard have developed leading from the wall. The



iMessage





Shane-PAM &gt;

shifted slightly to the left. The backyard walls bottom block has been completely pushed out of the wall, likely from hydrostatic pressure. Three large cracks in our yard have developed leading from the wall. The outside corner brick 5 in. vertical crack has increased to over a 12 in. vertical crack with horizontal cracking. We are definitely experiencing ground movement from the continued water flow. The mold growth has escalated greatly with all this moisture, and in turn, as would be expected, has contaminated all areas of my home. I know you said you were taking this situation back to your supervisor. Has he been able to offer any resolution to these continuing issues?

Thanks you, Sheila Derian



iMessage





Shane-PAM >

This is a picture I took this morning just to give you an idea of the infiltration still occurring. Thanks, Sheila Derian

I am waiting on Duqusene light to hold a pole so we can cut and cap the main. Should be Wednesday Thursday this week

Thank you ,Shane.

Wed, Aug 31, 2:38 PM

We will not be out to do our work until next Wednesday. Just wanted to keep you posted

Thanks so much Shane, it is appreciated! Sheila Derian

Wed, Sep 21, 9:36 AM

Hi Shane,  
This is Sheila Derian. As you requested, I wanted to update you on



iMessage





Shane-PAM >

We will not be out to do our work until next Wednesday. Just wanted to keep you posted

Thanks so much Shane, it is appreciated! Sheila Derian

Wed, Sep 21, 9:36 AM

Hi Shane,  
This is Sheila Derian. As you requested, I wanted to update you on the water leak. The side foundation wall has not had water flow since you capped the line. However, the back foundation wall is still being infiltrated as it was when you observed it on 9/13. The mold generated by these conditions have become a grave concern. Travelers Insurance has not contacted me to date. Can you direct me to a supervisor who is handling this issue.  
Thank you

Read 9/21/22



iMessage 



## Office 0532

---

**From:** RACHAEL anne <rachael.anne81@yahoo.com>  
**Sent:** Monday, October 17, 2022 3:22 PM  
**To:** Office 0532  
**Subject:** [EXTERNAL] Fwd: FQ2819

**Caution! This email originated outside of FedEx. Please do not open attachments or click links from an unknown or suspicious origin.**

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <sam\_rjd@yahoo.com>  
**Date:** September 28, 2022 at 3:07:58 PM EDT  
**To:** rachael.anne81@yahoo.com  
**Subject:** Fwd: FQ2819

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Date:** March 4, 2022 at 2:08:06 PM EST  
**To:** [roravec@travelers.com](mailto:roravec@travelers.com)  
**Subject:** FQ2819

Travelers Insurance:

I am writing this email concerning claim number FQ2819 filed by Pennsylvania American Water Company on my behalf nearly nine months ago with regard to property damage caused by a badly deteriorated, perforated water main line leaking for many years underground and culminating with a surface rupture on 06/15/21 resulting in significant flooding. The Munhall Fire Marshal alerted Pennsylvania American Water Company to the flood situation and then visited our home to awaken us to make sure we were uninsured and alert us to the significant flooding occurring to our home.

I have previously submitted cost of repair estimates from certified contractors to restore the considerable property damage, which is on going.

We have allowed Travelers Insurance's independent engineer, Joe Fagan, Gateway Engineering, to perform two inspections of the damaged property. Both inspections, the only diagnostic equipment he utilized to assess damage was a flashlight, tape measure, and camera. He had no GPR nor GPS equipment to reveal underground voids caused by the leaking water main line as was indicated by suddenly appearing ground depressions and dying vegetation appearing on the property, all of which was brought to your attention and the attention of the engineer during his second inspection, which causes further structural damage.

Please send the engineer's findings and Travelers Insurance intent to handle the above

claim by email or regular mail. Your prompt attention to this matter is appreciated.

Sincerely,

Sheila Derian

200 E. Miller Avenue

Munhall, PA. 15120

Email: [Sam\\_rjd@yahoo.com](mailto:Sam_rjd@yahoo.com)

Sent from my iPhone

## Office 0532

---

**From:** RACHAEL anne <rachael.anne81@yahoo.com>  
**Sent:** Monday, October 17, 2022 3:22 PM  
**To:** Office 0532  
**Subject:** [EXTERNAL] Fwd: Claim FQW 2819

**Caution! This email originated outside of FedEx. Please do not open attachments or click links from an unknown or suspicious origin.**

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <sam\_rjd@yahoo.com>  
**Date:** September 28, 2022 at 3:08:43 PM EDT  
**To:** rachael.anne81@yahoo.com  
**Subject:** Fwd: Claim FQW 2819

Sent from my iPhone

Begin forwarded message:

**From:** Sheila Derian <[sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)>  
**Date:** April 12, 2022 at 1:48:30 PM EDT  
**To:** [roravec@travelers.com](mailto:roravec@travelers.com)  
**Subject:** Claim FQW 2819

This e-mail is a follow-up to my e-mail inquiry sent on 03/04/22 regarding the above third party claim # FQW 2819 to which I have received no response from Travelers after these thirty days. In my opinion, I believe that due to this excessive delay in responding to the claim, that Travelers is acting in bad faith.

I will be forwarding my concerns and all information previously sent to you to Alan D. Schnitzer CEO of Travelers Insurance to [schnitzer@travelers.com](mailto:schnitzer@travelers.com) for his office's response toward resolving this issue.

Thank you,  
Sheila Derian  
200 E. Miller Avenue  
Munhall, PA 15120  
E-mail: [sam\\_rjd@yahoo.com](mailto:sam_rjd@yahoo.com)

Sent from my iPhone

Exhibit 2

# AquaGuard Systems, Inc.

4240 Greensburg Pike, Suite 101  
Pittsburgh, PA 15221  
(412) 727-6218  
FAX (412) 727-6219  
PA HIC #8180

Date: July 15, 2022

Job Name: Sheila Derian

Job site: 200 E. Miller Street

City, State, Zip: Munhall, PA 15120

Phone: 412.969.3311

Total Cost: Dependent upon options chosen

Payment Schedule: Follow payment schedule on contract.

This proposal is valid for 30 days from the above date.

---

All material is guaranteed to be as specified. All work to be complete in a workmanlike manner according to standard practice. Any alteration or deviation from specifications below involving extra cost will be executed only upon written orders and will become an extra charge over the estimate. All agreements are contingent upon strikes, accidents, weather or delays beyond AquaGuard Systems, Inc. control. AquaGuard Systems, Inc. carries full liability and Workmen's compensation Insurance.

---

**NOTE:** This proposal describes additional work added to the original proposal dated July 12, 2022.

**NOTE:** Please refer to the included diagram for all aspects of this project.

## FOUNDATION REPAIR

Furnish all labor and material necessary to make the following repairs to the foundation of the home.

- Brace structure as needed.
- Remove the concrete pad at the rear of the home as well as the roof above it.
- Excavate the entire right rear and left foundation walls of the home to footer depth.\*  
**NOTE:** The trench will continue approximately 32' from the front left corner of the home and then tap into the storm sewer at the street. It has yet to be determined if there is a storm sewer there, and if the Borough will allow tap in. If not, adjustments will be made to the scope of work regarding this issue, as well as price.
- Once excavation is complete, remove the entire right and rear foundation walls. **NOTE:** This will likely be done in sections to minimize movement to the structure.
- The new foundation sections will be constructed with same size concrete block. These new foundation sections will be reinforced by grouting and rodding every 4' on center. Grouting and rodding refers to installing steel rod and concrete vertically into the hollow cells of the block. This dramatically increases the lateral strength of the wall.
- New glass block windows with vents will be installed at current window locations.
- The below grade portions of the right rear and left foundation walls will be waterproofed with a permanent waterproof membrane, either Tuff-N-Dri or Mel-Rol will be used in this application.
- A new Schedule 35 4" perforated french drainpipe will be installed along the footer of the right, rear, and left foundation walls.
- A new downspout system will be installed for the back left and the front left downspouts. This system will be entirely constructed of 4" Schedule 35 solid pipe and fittings.
- The new downspout system and the new french drain system will merge into a single solid Schedule 35 pipe at the front left corner of the home and continue to the street.
- The right rear and left foundation walls will be backfilled to within approximately 12" of grade with 2B gravel.  
**NOTE:** Where the concrete pad will be installed along the rear foundation wall will receive a full gravel backfill to prevent settlement of the new pad. The gravel will be covered by a landscape fabric to help prevent soil intrusion into the new drainage system.

- The remainder of the trench will be backfilled with soil from the excavation and rough graded.
- **NOTE:** AquaGuard recommends leaving the soil somewhat mounded for settlement.
- The concrete pad at the rear of the home will be replaced to previous dimensions.

Total job cost: \$85,850

#### NEW ROOF OVER REAR CONCRETE PAD

Furnish all labor and material necessary to construct a new shed style roof over the rear concrete pad which will be approximately 12'x25'.

- This new shed roof will include 2"x8" framing and rafters.
  - A main beam which will be a triple 2"x6" beam with three (3) 4"x4" treated support posts.
  - 7/16" OSB sheathing. This roof sheathing will be covered with ice and water shield to protect it. This will also protect the roof until the roofing contractor has the opportunity to install the new shingles.
  - Also included are new gutters and downspouts. The downspout will be fed to the new main drainage system that AquaGuard will be installing throughout the property. Also included is vinyl soffit and fascia and aluminum trim.
- NOTE:** The vinyl soffit will be installed to the underside of the new roof.

Total job costs: \$14,475

#### RETAINING WALLS:

Included in the retaining walls portion of this project is the smaller retaining wall nearest the front left corner of the home measuring approximately 20 feet in length by approximately 38 inches in height as well as the large retaining wall at the rear of the property measuring approximately 78 in total length with a height that varies between approximately 36 inches to approximately 60 inches in height and the section of retaining wall from the new front porch to the sidewalk measuring approximately 22 feet in length by approximately 2 feet in height.

**NOTE:** There currently exists a two tier retaining wall at the rear of the property. The new retaining wall will be a single level.

- Both retaining walls will include all necessary drainage and reinforcing grid as needed.
- Both retaining walls will be constructed entirely of Versa-Lok Standards.
- The homeowner has the choice of colors. There is no difference in price for the different color choice.

Total cost both retaining walls: \$49,465

#### FRONT PORCH

- The existing front porch will be replaced.
- The upper pad will measure approximately 4 feet x 6 ½ feet.
- Included is all necessary demolition of the existing porch.
- Included are all new footers and any subbase preparation.
- The exposed block will be constructed with a split faced block for a more appealing appearance.
- **NOTE:** This proposal does not include the railing because there are too many varying railing options. This will be discussed with the homeowner during the project. The homeowner will be required to make the railing choice of color, material and style.

Total cost for front porch replacement: \$9,750

### FRONT STEPS / WALKWAY

- The existing front walkway will be entirely removed and replaced with a more simple design. The new steps will be approximately 4 feet wide.
- All necessary subbase preparation will be included.
- The portion of the front walkway parallel to the front street is approximately 24 feet in length.
- The remaining portion of the front walkway is approximately 18 feet in length.
- All concrete for the walkways, rear porch and the driveway will be 4000 PSI reinforced with fibercrete and includes all necessary sealing at the end of the project.

Total cost for front steps: \$10,360

### REAR PORCH

- The existing rear porch measures approximately 8 feet by 17 feet 3 inches will be removed along with the roof directly above.
- **NOTE:** This portion of the project **does not** include replacing the roof over the rear concrete porch. The cost to do so is not included in this proposal.
- The new concrete pad will measure approximately 25 feet by 12 feet.
- All necessary subbase preparation is included.
- The new pad will be 4000 PSI, reinforced with fibercrete and includes all necessary sealing at the end of the project.

Total cost for rear porch: \$7,860

### DRIVEWAY REPLACEMENT

**NOTE:** This includes replacing approximately 11 feet x 6 feet of the existing garage slab.

- The existing driveway will be completely removed and replaced with a new driveway measuring approximately 31 feet in length x 11 feet wide.
- Included is all necessary subbase preparation, 4000 PSI concrete, reinforced with fibercrete and all necessary sealing at the end of the project.
- This part of the project will also include removing a section of the garage slab immediately adjacent to the driveway measuring approximately 11 feet x 6 feet.

Total cost for driveway replacement: \$13,125

**JOB NOTE:** The current plan for all necessary drainage is to tap into the existing storm system at the manhole located at the front left corner of the property. Please refer to the included diagram.

**JOB NOTE:** The homeowner has been asked to confirm with the borough that this is allowed. If the borough determines this option is not viable, a subsequent plan will be made based on borough requirements. Any additional cost will be discussed with the homeowner and a change order issued prior to any work being performed.

**NOTE:** Due to the fluctuation in material costs, prices quoted are subject to change at time of project installation. Any change in pricing will be discussed with the customer prior to job start.

A general clean-up of the job site will be performed and all job related debris will be hauled away.

This proposal does not include final yard repair i.e. topsoil and seed.

**Please note the homeowner is responsible for contacting their local municipality to determine if a building permit is required and to obtain permits as needed.**

**Please note this proposal does not include permit costs if needed. AquaGuard will assist you in the permit application process if needed.**

**\*In the rare occurrence that the footer exceeds eleven (11) courses, there will be an upcharge of \$40 per linear foot to dig to footer depth. These charges will be discussed with the customer at the time it is discovered and will be approved by a change order signed by the owner.**

**During the process of lifting, leveling or replacing floor joists, band boards, sill plates or any structural repair AquaGuard will make every effort to prevent or minimize damage to walls, flooring, doors, windows and fixtures. AquaGuard is not responsible for any repair cost or restitution cost of any damage.**

**AquaGuard thanks you for the opportunity to earn your business! Please feel free to contact Tom Gallagher at 412.600.7774 should you have any questions concerning this proposal.**



Lane Plastering & Stucco, LLC  
 920 Thompson Run Road,  
 West Mifflin, PA 15122  
 Office: 412-205-3543  
 Fax: 412-461-8398  
 Office E-mail: glanestucco@gmail.com  
 Website: www.lanestucco.com  
 PA035224

# Proposal

Number E3552  
 Date 6/27/2022

Submitted To	Contact Number
Sheila Derian 200 East Miller Ave Munhall, PA, 15120	412-969-3311

Project Location
Sheila Derian 200 East Miller Ave Munhall, PA, 15120

Customer #	Payment Terms	Project
1606	Due day of completion	200 East Miller Ave

Description	Amount
Repair plaster on kitchen ceiling & wall. - Match Existing Texture	\$2,100.00
* Please wait 30 days before applying paint or any other finishes to plaster.	

<b>Total</b>	<b>\$2,100.00</b>
--------------	-------------------

**LIABILITY & WORKMANS COMP AVAILABLE UPON REQUEST**

All material is guaranteed to be as specified. All work to be completed in a substantial workmanlike manner according to specifications submitted, per standard practices and guidelines and within a reasonable timeframe. Any alteration or deviation from above specifications involving extra costs will be executed only upon written order, and will become an extra charge over and above the estimate. Tent & heat are extra. Excludes flashing, permits, and bonds.

**\*Prices good for 30 days. Prices subject to change after 30 days\***

**Please sign & date below to accept price listed above**

Customer \_\_\_\_\_  
 Lane Plastering & Stucco \_\_\_\_\_

Date \_\_\_\_\_  
 Date \_\_\_\_\_



Sheila & Ronald Demari  
Quote



### 1 Year Investment

**\$61,181** \$/MONTH

WINDOWS 10 DOORS 1

### Pittsburgh Offer

**\$12,236**

RENEWAL SAVINGS DISCOUNT 20%

SEE OFFER DETAILS

**\$12,236**  
SAVINGS



Investment Amount

**\$48,945** \$/MONTH



\$0 DEPOSIT

**\$48,945** BALANCE

Payment Options

3:01

LTE 

4 Messages

< Inbox

Bakers Proposal Claim...



Begin forwarded message:

**From:** Jon L Mitchell

[<jmitchell@bakerswaterproofing.com>](mailto:jmitchell@bakerswaterproofing.com)

**Date:** July 8, 2021 at 3:40:17 PM EDT

**To:** "sam\_rjd@yahoo.com"

[<sam\\_rjd@yahoo.com>](mailto:sam_rjd@yahoo.com)

**Subject:** Bakers Proposal Claim # SQ2819

Hey Sheila,

Here is your proposal for the work we discussed. This will address the bowing and sheering walls caused by the Water main break. Your wall had 3 ½" of sheering on the back wall and 1 ¼" of bowing on the side wall. We are also addressing the water leakage issue that caused as well. We will be installing that system along the specific areas that were affected by the water break. The only thing we would need back to get the work started would be the deposit shown on proposal, as well as the signed contract. If you or Travelers have any questions don't hesitate to reach out at anytime! If I can't answer please leave me a voicemail and I will get back to you ASAP. Have a great day!

Jon Mitchell

Certified Field Inspector

**Baker's Waterproofing & Foundation Repair**



**Contract**

LICENSED CONTRACTOR: PA158514

Customer: <b>Sheila Derian</b>	Date: <b>7/8/2021</b>
Address: <b>200 East Miller Ave Munhall PA 15120</b>	
Project Location: <b>200 East Miller Ave Munhall PA 15120</b>	
Phone (Work or Home) <b>(412) 969-3311</b>	E-Mail: <b>sam_rjd@yahoo.com</b>

Proposed Products	Quantity	Unit Price	Total
5 Year Annual Service Plan	1.0	\$890.00	\$890.00
AquaStop WallSeal	84.0	\$20.00	\$1,680.00
AquaStop BasementGutter	84.0	\$56.00	\$4,704.00
AquaStop Basement Triple	1.0	\$2,999.00	\$2,999.00
AquaStop Inspection Port	1.0	\$22.00	\$22.00
Buried Discharge Line	15.0	\$25.00	\$375.00
AquaStop Angled Yardwell	1.0	\$33.00	\$33.00
<b>Additional Products</b>			\$10,429.00
<b>Subtotal:</b>			\$21,132.00
<b>Discount:</b>			\$2,113.20
<b>Contract Price:</b>			\$19,018.80

This Contract, along with the Terms and Conditions, the Warranties, the Notice of Cancellation, and the Payment Terms form the Agreement (the "Agreement") between the Customer and Baker's Waterproofing & Foundation Repair (the "Contractor").

- |   |  |
|---|--|
| <p>X _____ Customer is responsible for removing all personal items from the work area.</p> <p>X _____ Customer assumes responsibility for damages to hidden or unmarked utility lines.</p> <p>X _____ Stabilization is warranted. Contractor can attempt to lift at Customer's request.</p> | <p>X _____ A full perimeter drainage system with sump pump was recommended.</p> <p>X _____ Customer is aware of warranty and all addenda.</p> <p>X _____ Customer is responsible for providing all necessary electrical outlets.</p> |
|---|--|

Acceptance of Contract - The above prices, specifications, conditions, and separate warranty are satisfactory and hereby accepted. You are authorized to do work as specified. Payment will be made as outlined above or in accordance with the attached addendum. Subject to the Terms and Conditions, Contractor shall endeavor to start work within one hundred fifty (150) days of the date of the Contract and shall endeavor to complete the work within an estimated one hundred twenty (120) days of the start date of the work..

**Customer**

**Contractor**

X \_\_\_\_\_

X \_\_\_\_\_

X \_\_\_\_\_

Date \_\_\_\_\_ 7/8/2021 \_\_\_\_\_

Date \_\_\_\_\_ 7/8/2021 \_\_\_\_\_

Supplemental Notes Baker's Waterproofing & Foundation Repair to:

Proposed Products Continued	Quantity	Unit Price	Total
Discharge in trench	23.0	\$10.00	\$230.00
SettleStop Wall Anchor w/ 7' C-Channel	7.0	\$900.00	\$6,300.00
SettleStop Wall Anchor	5.0	\$760.00	\$3,800.00
Remove and replace laundry tub	1.0	\$99.00	\$99.00
		<b>Subtotal:</b>	<b>\$10,429.00</b>

### Product Specifications

#### 5 Year Annual Service Plan

Five Years of service is included in this contract.

#### AquaStop Angled Yardwell

Install Angled Yard Well

#### AquaStop Basement Triple

null

#### AquaStop BasementGutter

Install Basement Gutter. This includes removing concrete as needed, drilling weep holes as necessary in the interior cores of the CMU's, installation of our non-clogging waterproofing drainage system, clean drainage rock and replacement of concrete. Customer understands the concrete will not be an exact match due to aging and different mixes of concrete. Customer responsible for removing and replacing finished walls unless otherwise specified in this contract. Customer will remove all personal items at least 4 feet away from the work area. Customer will remove at least 2' of finished flooring from the wall. Customer is responsible for replacing the finished flooring. Baker's Waterproofing is not responsible for finished flooring. Wallseal wall system is highly recommended to direct any water seepage from the walls into the drainage system. If Wallseal is not installed on the walls up to the height of the outside grade, Baker's Waterproofing cannot be held responsible in the event that water pushes through the walls and bypasses the drainage system.

#### AquaStop Inspection Port

Install inspection ports as described in the contract for access to Basement Gutter system.

#### Buried Discharge Line

Extend and bury sump discharge line. Additional linear footage indicated on the products page of the contract to direct sump discharge water away from structure.

#### SettleStop Wall Anchor

Install Wall Anchors to stabilize bowing walls. We can attempt to straighten the walls over time, but is not guaranteed. Final location of the Wall Anchors is subject to change. Customer understands that a trench will be dug in their yard and an excavator may be used. Any additional soil or seed required will be the responsibility of the Customer. Baker's Waterproofing is not responsible for damage to landscaping.

#### SettleStop Wall Anchor w/ 7' C-Channel

Install Wall Anchors to stabilize bowing walls. We can attempt to straighten the walls over time, but is not guaranteed. Final location of the Wall Anchors is subject to change. Customer understands that a trench will be dug in their yard and an excavator may be used. Any additional soil or seed required will be the responsibility of the Customer. Baker's Waterproofing is not responsible for damage to landscaping.

#### Contractor agrees to

- Remove and replace concrete as necessary in the work area. Customer understands concrete patch will not match existing concrete.

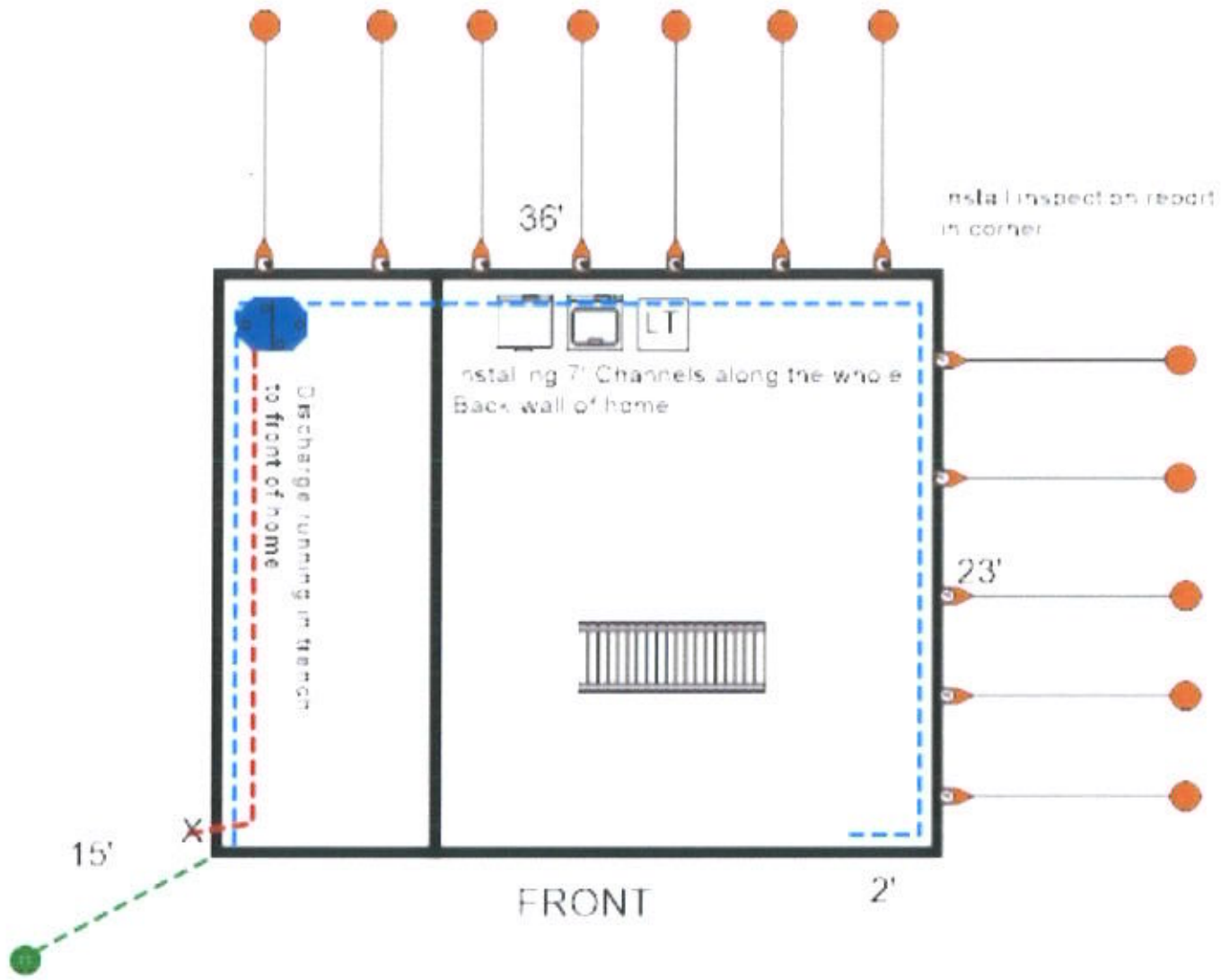
Installing 7' channels along back wall. Removing and replacing laundry tub.

#### Customer agrees to

- Make final payment to foreman after completion of work.
- Provide dedicated electrical for any sump pumps or dehumidifiers.

Customer to have cabinets on garage wall removed prior to installation. - Mark any private lines that may be hidden underground. Customer assumes all liability if damage should occur. - Obtain permits if required in area. - Move all stored items from area to be treated. - Protect personal items from dust. - Repair any sprinkler systems, grass and/or landscaping that may be damaged during installation. The use of excavators or trenchers may be required.

DRAWINGS





Date: 07/11/2022

690 E WATERFRONT DR  
 MUNHALL, PA 15120-5000  
 (412) 461-8002

**Project #:** 740584294  
**Customer Name:** derian.shlia  
**Customer Phone:** (412) 969-3311  
**Customer Address:** 200 E MILLER AVENUE  
 MUNHULL  
 MUNHALL PA 15120

**Project name:** flooring sale

**Product List**

Item Description	Availability	Qty	Unit Price	Total Price
BRC 3.25IN SLD BTRSC TCH OK 22SQFT				
<b>Item #:</b> 325828	<u>Out of Stock</u>	30	\$107.58	\$3,227.40
<b>Model #:</b> ABC1426				
			<b>Product Subtotal:</b>	<b>\$3,227.40</b>

**Installation**

Installation Configuration	Total Price
Wood - Labor Configuration	
INSTALL TRANSITIONS HWOOD	
INSTALL QTR HWOOD	
BASIC LABOR HARDWOOD NAIL DOWN	
<b>Project Level Fees Total</b>	<b>\$2,532.22</b>
<b>Deductible Detail #738955224</b>	<b>\$-0.01</b>
	<b>Installation Subtotal: \$2,532.21</b>
	<b>Order Subtotal: \$5,759.61</b>

**Salesperson:** KIMBERLY WALLACE

**Accepted By:**

**Date:** 07/11/2022

This Quote is valid until 08/10/2022 This is an estimate only. This estimate does not include tax, special fees (e.g., White Goods Tax), or delivery charges. Delivery of all materials contained in this estimate are subject to availability from the manufacturer or supplier.

All the above quantities, dimensions, specifications and accessories have been verified and accepted.

I understand that this order will be placed according to these specifications and is non-refundable.

Print Cancel

Exit



Date: 07/11/2022

690 E WATERFRONT DR  
 MUNHALL, PA 15120-5000  
 (412) 461-8002

**Project #:** 740585632  
**Customer Name:** derian shlia  
**Customer Phone:** (412) 969-3311  
**Customer Address:** 200 E MILLER AVENUE  
 MUNHULL

**Project name:** Tile

MUNHALL PA 15120

**Product List**

Item Description	Availability	Qty	Unit Price	Total Price
12-24 WINDSOR WHITE POL <b>Item #:</b> 2240410 <b>Model #:</b> 1001-0262-0 <b>Manufacturer:</b>	In Stock	112	\$4.99	\$558.88
6-12 STATUARY WHITE PORC TILE <b>Item #:</b> 1030379 <b>Model #:</b> 1030379 <b>Manufacturer:</b>	In Stock	40	\$1.77	\$70.80
KERACOLOR S PEARL GRAY #19 25-LB <b>Item #:</b> 6488 <b>Model #:</b> 21925 <b>Manufacturer:</b> MAPEI	In Stock	3	\$14.48	\$43.44
1/4-IN X 3-FT X 5-FT HARDIE BACKR <b>Item #:</b> 11640 <b>Model #:</b> 469333023 <b>Manufacturer:</b>	In Stock	16	\$12.97	\$207.52
CERAMIC TILE THINSET WHITE 50-LB <b>Item #:</b> 12949 <b>Model #:</b> 10750136 <b>Manufacturer:</b>	In Stock	6	\$17.88	\$107.28
<b>Product Subtotal:</b>				<b>\$987.92</b>

**Installation**

Installation Configuration	Total Price
Ceramic Tile / Stone - Floor - Labor Configuration	
INSTALL TRANSITIONS TILE	
INSTALL QTR TILE	
INSTALL BACKERBOARD TILE	
BASIC LABOR TILE INSTALL	
INSTALL WALL BASE TILE	
<b>Project Level Fees Total</b>	<b>\$2,297.41</b>

**Deductible Detail #738955224**

\$-0.01

**Installation Subtotal:** \$2,297.40

**Order Subtotal:** \$3,285.32

**Salesperson:** KIMBERLY WALLACE

**Accepted By:** **Date:** 07/11/2022

This Quote is valid until 08/10/2022 This is an estimate only. This estimate does not include tax, special fees (e.g., White Goods Tax), or delivery charges. Delivery of all materials contained in this estimate are subject to availability from the manufacturer or supplier.

All the above quantities, dimensions, specifications and accessories have been verified and accepted.

I understand that this order will be placed according to these specifications and is non-refundable.

[Exit](#)



[Learn More](#)

[Book Now](#)

855-789-7637

## YOUR LOCAL SERVICE QUOTE

### Quote Details

[Book Now](#)

Quote Number: 100371956

Quote expires: 07/26/2022

Container(s): 1 X 12-foot length container

#### Container 1

Empty Container Delivery Zip: 15120

Full Container Delivery Zip: 15120

#### Container 2

Empty Container Delivery Zip: 15120

Full Container Delivery Zip: 15120

First delivery date: August 2, 2022

Your total estimated moving price listed below **excludes all applicable taxes** and is based on the date(s), months of storage, and location(s) you provided. Your final price will be confirmed when you place your order.

Description	Price
<b>Container Delivery</b>	<b>\$158.00 USD</b>
Deliver Empty Container to Your Location	79.00
Deliver Empty Container to Your Location	79.00
<b>Recurring</b>	<b>\$438.00 USD</b>
Monthly Rental of Container at Your Location	209.00
Monthly Rental of Container at Your Location	209.00
Container Only Protection Option - Monthly Fee	10.00
Container Only Protection Option - Monthly Fee	10.00
<b>Final Pickup</b>	<b>\$158.00 USD</b>
Pickup Empty Container from Your Location	79.00
Pickup Empty Container from Your Location	79.00