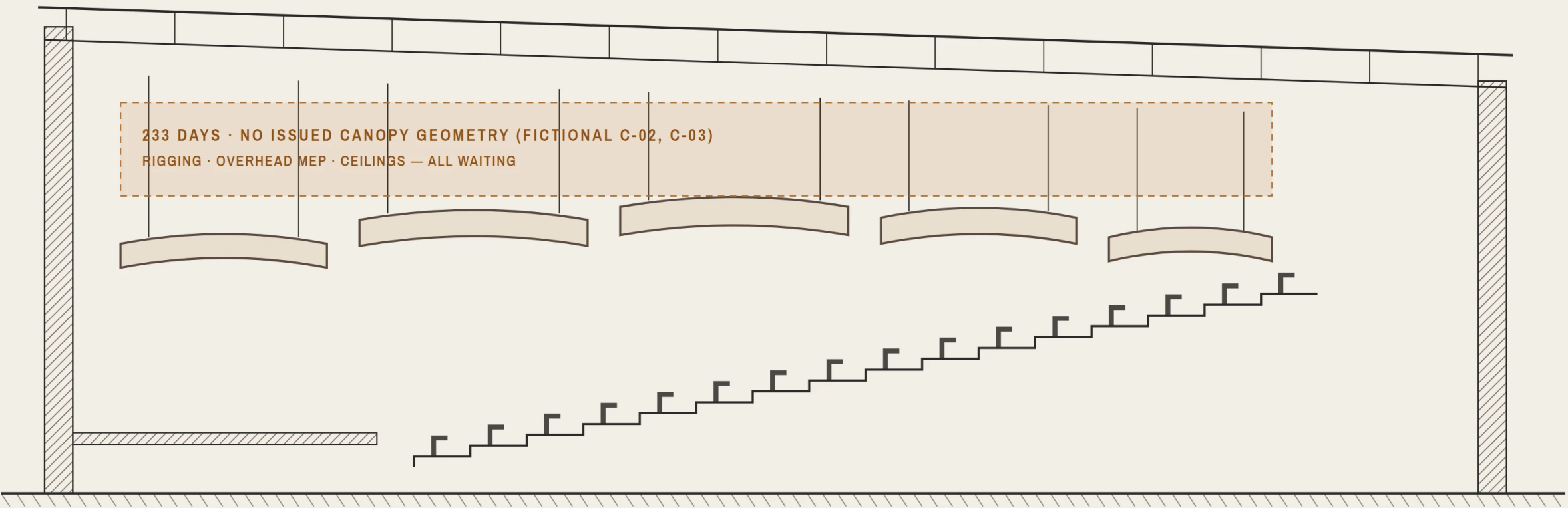


432 DAYS



A concert hall, fourteen months late — and a demonstrative system that shows three arbitrators which delays actually moved the building.



Calder-Voss Construction Group v. Harborlight Center for the Arts

Harborlight was to be a coastal city's new concert hall: 2,150 seats under a sculpted acoustic canopy, a \$312M guaranteed maximum price, substantial completion due October 15, 2023. The building finished December 20, 2024 — 432 days late — and the parties dispute every one of those days.

The contractor's account: a transformative donor gift led the owner to reopen a finished acoustic design; the canopy directive stalled construction drawings for 233 days and ignited 312 RFIs; a mid-project façade re-procurement and a year-late switchgear delivery did the rest.

The owner's account: the contractor erected steel in a self-serving sequence and botched MEP coordination — 1,410 clash reports and a summer of rework — so the owner's changes ran harmlessly in the background while contractor failures consumed the float. The owner seeks \$19.44M in liquidated damages; the contractor claims \$58.7M.

DESIGN EXERCISE • THE CONTRACTOR

Posture: three-arbitrator construction arbitration (fictional). Objective: give the panel a working model of the critical path, so “happened during” and “caused” can never be confused.

A building is a sequence, not a pile

At any moment, one chain of activities carries the completion date — the chain with no slack. Only events standing on that chain can move the finish. Everything else, however dramatic, spends float.

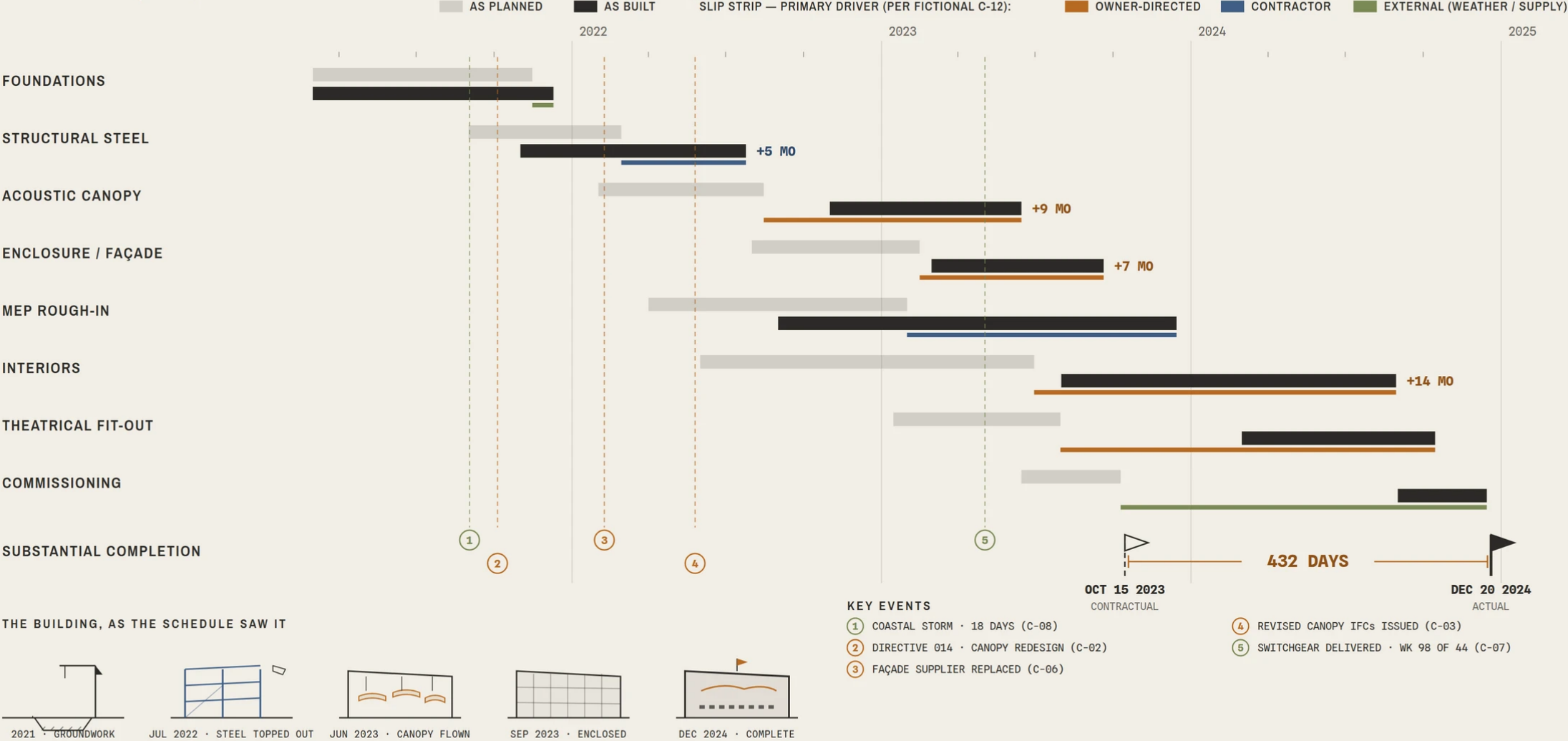
You cannot hang a ceiling you haven't drawn. You cannot finish rooms in a building you haven't enclosed. Drawn in section, dependency stops being scheduling jargon and becomes architecture — which is why the system's signature exhibit is a drawing of the hall itself.

The honest rule the whole system obeys: disputed or concurrent time is always dual-hatched, never silently assigned to a side; both experts' allocations are drawn at identical scale with their methods named; and the contractor's own 27 conceded days appear in the contractor's own color.

The single most important takeaway: traced through the schedule's real dependencies, the path runs through the owner's two decisions for 290 of the 432 days.

THE BUILDING THEY PLANNED. THE BUILDING THEY BUILT.

Nine construction phases, as scheduled and as executed — March 2021 to December 2024 (fictional project)



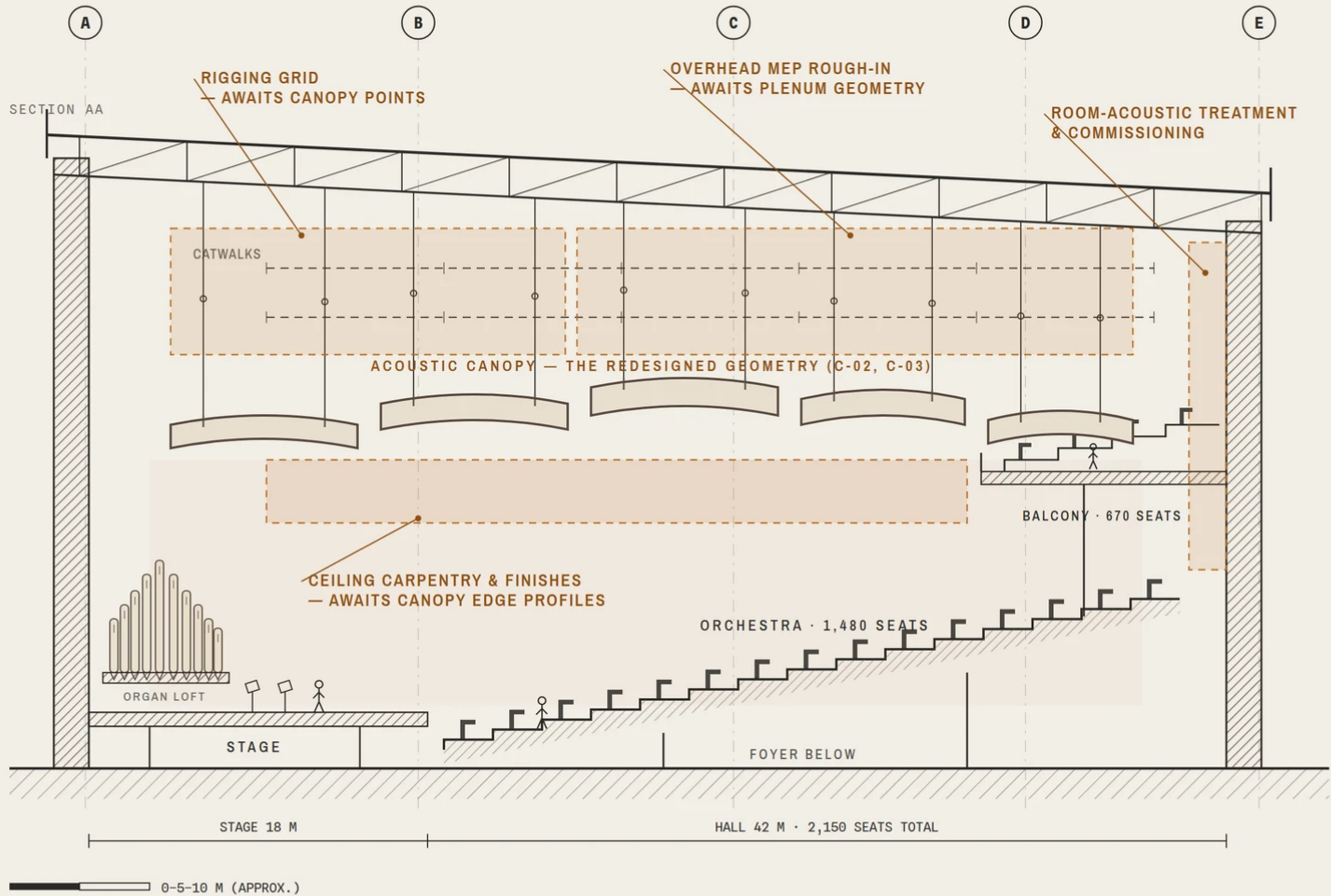
HARBORLIGHT PERFORMING ARTS CENTER — FICTIONAL PROJECT
CALDER-VOSS V. HARBORLIGHT (FICTIONAL ARBITRATION) · BASELINE C-01 · UPDATES C-11

PANEL 2.1 · PLANNED VS. BUILT
SCHEDULE SIMPLIFIED FOR PRESENTATION — NOT FOR CONSTRUCTION

INDEPENDENT SPECULATIVE CASE STUDY
ALL PARTIES, EVIDENCE, AND DATA ARE FICTIONAL AND CREATED SOLELY TO DEMONSTRATE LITIGATION-GRAPHICS STRATEGY

WHY ONE DRAWING HELD THE ROOM

Work that could not begin until the acoustic canopy's geometry was final — simplified section, fictional venue



THE HELD PERIOD



HARBORLIGHT PERFORMING ARTS CENTER — FICTIONAL PROJECT
SECTION AA · SIMPLIFIED FOR PRESENTATION — NOT FOR CONSTRUCTION · FICTIONAL C-02, C-03, C-11, C-14

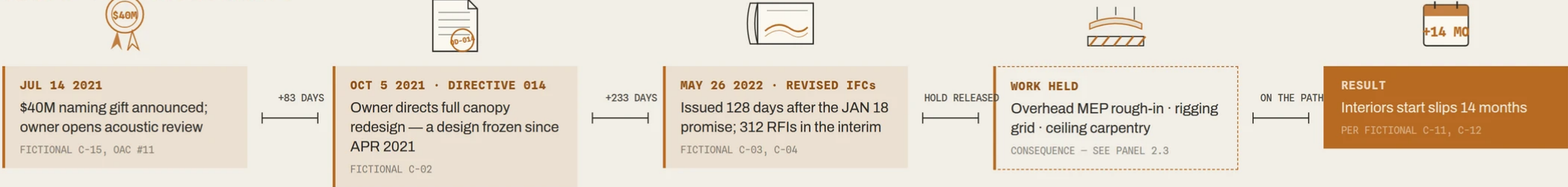
PANEL 2.3 · THE CANOPY, IN SECTION
2,150-SEAT MAIN HALL · ORCHESTRA + BALCONY

INDEPENDENT SPECULATIVE CASE STUDY
ALL PARTIES, EVIDENCE, AND DATA ARE FICTIONAL AND CREATED SOLELY TO DEMONSTRATE LITIGATION-GRAPHICS STRATEGY

TWO DECISIONS, TWO CHAINS

How a naming gift and a façade memo became fourteen months of held work (fictional reconstruction)

CHAIN A · THE ACOUSTIC CANOPY



CANOPY RFIs, CUMULATIVE

FEB-SEP 2022 (C-04)



CHAIN B · THE FAÇADE



CONTEMPORANEOUS NOTICE · CALDER-VOSS FLAGGED CANOPY CRITICALITY IN WRITING FROM NOV 2021 — OAC MEETING MINUTES #16 ONWARD (FICTIONAL C-15). THE CHAINS ABOVE WERE ARGUED IN REAL TIME, NOT RECONSTRUCTED FOR ARBITRATION.

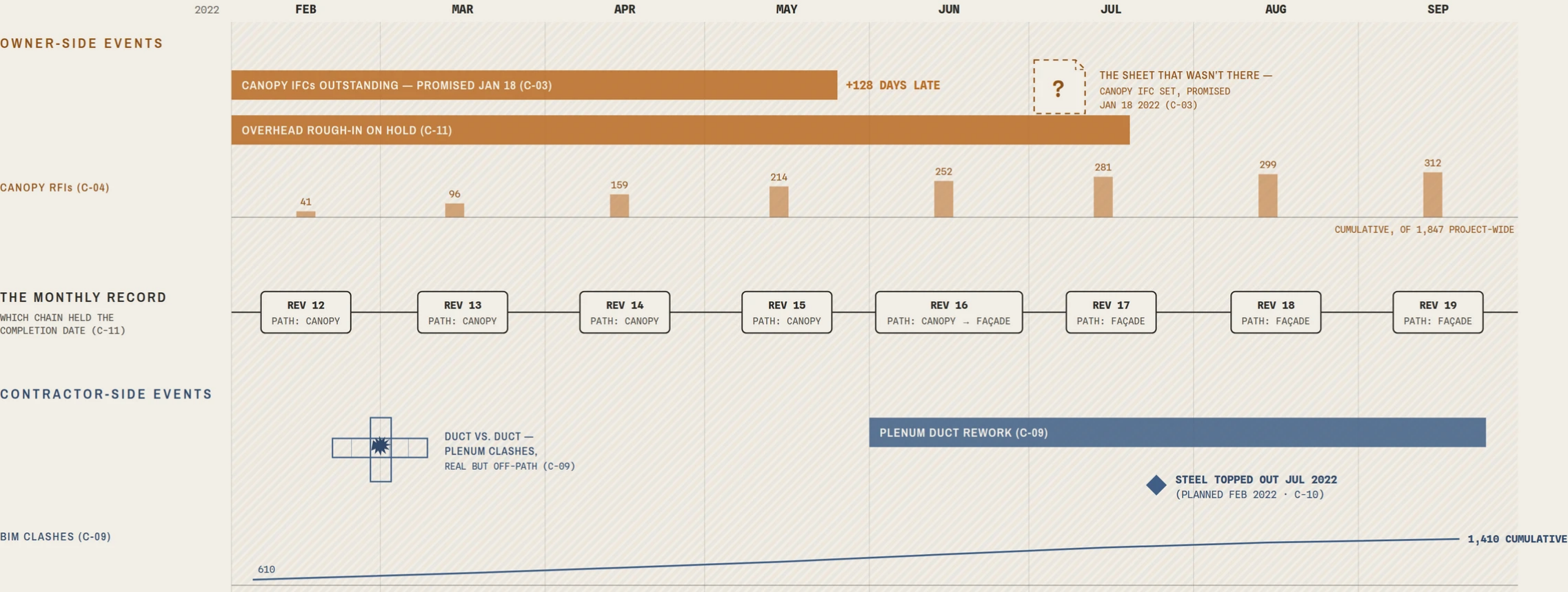
HARBORLIGHT PERFORMING ARTS CENTER — FICTIONAL PROJECT
FICTIONAL EXHIBITS C-02, C-03, C-04, C-06, C-15 · SPAN LABELS IN CALENDAR DAYS

PANEL 2.2 · TWO DECISIONS, TWO CHAINS
SIMPLIFIED FOR PRESENTATION — NOT FOR CONSTRUCTION

INDEPENDENT SPECULATIVE CASE STUDY
ALL PARTIES, EVIDENCE, AND DATA ARE FICTIONAL AND CREATED SOLELY TO DEMONSTRATE LITIGATION-
GRAPHICS STRATEGY

EIGHT MONTHS, TWO STORIES, ONE PATH

February–September 2022: the owner’s design stall and the contractor’s rework — and which one held the completion date (fictional monthly schedule records)



Both tracks were busy. The neutral spine — recorded monthly, before any dispute — shows the completion date standing on the owner’s two chains all eight months.

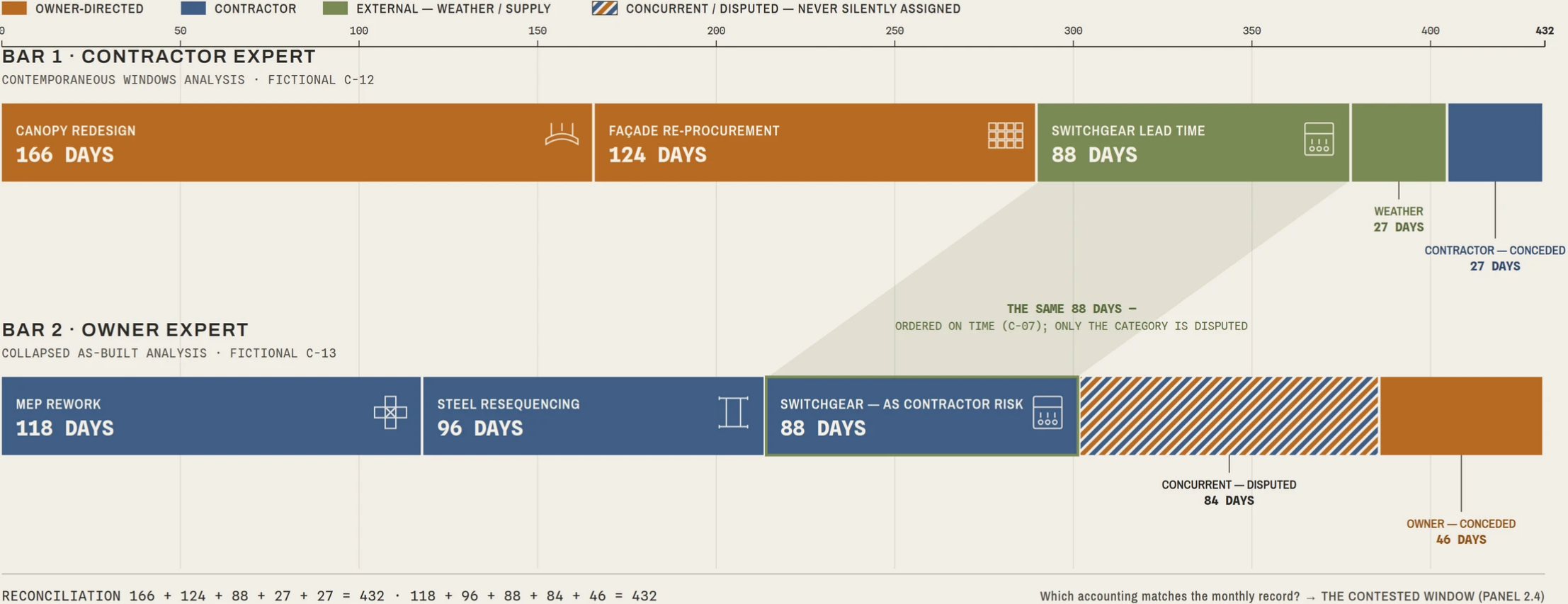
HARBORLIGHT PERFORMING ARTS CENTER — FICTIONAL PROJECT
FICTIONAL EXHIBITS C-03, C-04, C-09, C-10, C-11 · SPINE CHIPS CITE MONTHLY UPDATE REVISIONS

PANEL 2.4 · THE CONTESTED WINDOW
SIMPLIFIED FOR PRESENTATION — NOT FOR CONSTRUCTION

INDEPENDENT SPECULATIVE CASE STUDY
ALL PARTIES, EVIDENCE, AND DATA ARE FICTIONAL AND CREATED SOLELY TO DEMONSTRATE LITIGATION-GRAPHICS STRATEGY

432 DAYS, TWO ACCOUNTINGS

The same delay, allocated by each side's expert — methods named, days reconciled (fictional analyses)



HARBORLIGHT PERFORMING ARTS CENTER — FICTIONAL PROJECT
FICTIONAL EXPERT REPORTS C-12 (CONTRACTOR) AND C-13 (OWNER) · ONE INK MEANS ONE THING IN BOTH BARS

PANEL 2.5 · 432 DAYS, TWO ACCOUNTINGS
SIMPLIFIED FOR PRESENTATION — NOT FOR CONSTRUCTION

INDEPENDENT SPECULATIVE CASE STUDY
ALL PARTIES, EVIDENCE, AND DATA ARE FICTIONAL AND CREATED SOLELY TO DEMONSTRATE LITIGATION-GRAPHICS STRATEGY

Eleven coordinated exhibits, one drawing set

- D-1 · One building, one path — the 9-phase network
- D-2 · Planned vs. built — ghost and fact
- D-3 · Two decisions, two chains — dated document nodes
- D-4 · The canopy, in section — the spatial why
- D-5 · The building's skin and spine — façade & switchgear
- D-6 · Paper follows the directive — RFI/CO accumulation

- D-7 · The contested window — dual tracks, neutral spine
- D-8 · 432 days, two accountings — twin allocation bars
- D-9 · Concurrency, defined — the teaching exhibit
- D-10 · The path, month by month — 12-state stepped build
- D-11 · The claim, reconciled — days to remedy

VISUAL SYSTEM

■ Owner ochre ■ Contractor steel ■ External moss

Archivo + Spline Sans Mono · drawing-set title blocks · dimension strings, no arrowheads · disputed time is always hatched.

Independent speculative case study

This study was created independently to demonstrate litigation-graphics strategy for a complex construction dispute. All parties, the project, documents, schedules, day counts, and expert analyses are fictional and reconcile by construction: both allocations sum to 432; the claim build-up sums to \$58.7M.

No client engagement, award, or result is claimed or implied. The deliverable is the communication system itself.

Method: fictional project record built first (baseline CPM, 34 monthly updates, RFI/CO logs, procurement files, weather data); the schedule reduced to nine phases with a stated method; the system designed outward from the two exhibits the case would turn on.

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