

# EXHIBIT 13



**Hon. William L. Bettinelli (Ret.)**

**Hon. William L. Bettinelli (Ret.)** is a skilled mediator, settlement judge, and special master. Judge Bettinelli has extensive experience in complex multi-party construction, insurance, environmental, real estate, catastrophic personal injury, wrongful death, and employment cases.

#### **ADR Experience and Qualifications**

- Since joining JAMS in 1991, he has served exclusively as a mediator and arbitrator
- Fourteen-year judicial career focused on civil litigation and case resolution
- Successful resolution of the following types of cases:
  - **Environmental:** Multi-party actions involving private, public entity, Super Fund clean-ups, toxic torts, underground storage tanks, land use, industrial clean-ups, and allocation issues
  - **Construction:** Matters involving all types of structures (residential, commercial, industrial, schools, and hospitals), developers, general contractors, subcontractors, design professionals, insurers, bonding companies, public and private owners. Issues involving defective work, design, and claims for delay damages and extras, allocation, and insurance coverage disputes
  - **Insurance:** First and third party insurance coverage, reinsurance, excess, and bad faith matters
  - **Torts:** Personal injury and product cases involving catastrophic injuries and wrongful death
  - **Employment:** Sexual harassment, discrimination (gender, age, race), and wrongful termination
  - **Business/Commercial:** Shareholder actions, partnership and other business dissolutions, and mergers and acquisition litigation
  - **Class Actions:** Product defect, construction defect, and noise discharge actions

#### **Representative Matters**

- Construction action by school district against contractors and design professionals concerning construction and design of a school, and cross-claims for delay damages and extras
- Class action by multiple homeowners against developer, contractors, and design professionals relating to structural defects
- Environmental action by major international corporation, landowner, against an aerospace corporation, former owner, to recover past and future clean-up expenses for solvent contamination that had reached the aquifer
- Sexual harassment and gender discrimination claim by multiple female employees against a multinational corporation
- Wrongful death action against automobile manufacturer for fire caused by design defects
- Crush and amputation injury claim of industrial worker against 50-year chain of owners, manufacturers, and modifiers of the machinery
- National class action against a multi-national company relating to building product defects
- Trial judge in notable appellate cases including: *Silberg v. Anderson*, (litigation privilege), *Gregori v. Bank of America* (lender liability), *Caplungo v. Bondi* (defined an element of negligence per se)

#### **Honors, Memberships, and Professional Activities**

- Recognized as a Best Lawyer, Alternative Dispute Resolution Category, *Best Lawyers in America*, 2006-2010
- Co-author, *California Discovery Handbook* (West Publishing Company)
- Law Professor (Real Property), Empire College of Law
- Instructor: Civil Procedure, Discovery, Torts, Lender Liability, and ADR
- ADR Forms Committee and editorial contributor, *California Practice Guide: Alternative Dispute Resolution* (the Rutter Group)

#### **Background and Education**

- Chairman of The Board of Directors of JAMS, 2004-2006
- Superior Court of Sonoma County, 1982-1991, Presiding Judge, 1984, Principal Civil Law and Motion Judge, supervised judicial arbitration program, 1986-1991; Presiding Judge of the Appellate Department, 1985
- Sonoma County Municipal Court, 1977-1982, Presiding Judge twice
- J.D., University of California, Berkeley, Boalt Hall School of Law, 1969

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*Recognized as a Best Lawyer, Alternative Dispute Resolution Category, Best Lawyers in America, 2006-2010*

#### **Case Manager**

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- B.S., Fresno State College, 1966