

LAW OFFICES
CAVANAUGH | QUESADA, PLC

1027 S. WASHINGTON AVE., SUITE A
ROYAL OAK, MICHIGAN 48067
(248) 543-8320

PETER J. CAVANAUGH

E-MAIL: pcavanaugh@cqlawfirm.com

December 6, 2020

To Whom it May Concern:

Re: Attorney Todd W. Grant, MHSA, JD (P45531)

I am providing this reference for Todd who, for six years from September 2014 to November 2020, worked as the Senior Attorney at my law firm Cavanaugh & Quesada, PLC. Todd was laid off due to the impact of the Covid-19 pandemic and its accompanying shutdowns.

Cavanaugh & Quesada is a boutique construction law firm (website: MichiganConstructionLaw.com). Our clients include developers, general contractors, subcontractors, suppliers of material and equipment, and licensed architects and professional engineers. Most conduct business in Southeast Michigan, but many conduct business state-wide, and some have a national reach.

I first met Todd in late 2008 or early 2009 when our respective clients were involved in a number of construction lien foreclosure lawsuits in state circuit courts following the collapse of the lending markets.

Todd has almost three decades of experience as an attorney. His experience and insight were well used in all aspects of civil litigation — settling disputes before complaints were filed; strategizing litigation; drafting pleadings, discovery, motions, and briefs; conducting depositions, court-ordered facilitation, mediation (case evaluation), arbitration, evidentiary hearings and trials; handling collections, and negotiating at all stages of a lawsuit.

A partial list of the types of litigation Todd handled include construction defects, foreclosure of construction liens, contract disputes, zoning disputes, declaratory actions against insurers, landlord-tenant, and actions on construction payment bonds. And Todd was involved in non-litigation matters as well, including employment, covenants-not-to-compete, contract drafting, and state license complaints.

During his last few months at the firm, Todd settled a number of disputes even before a complaint was filed. The Covid-19 pandemic has had varied influences on potential litigation, often to the advantage of early settlement.

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I would be happy to expand upon the above should you wish to call or email me (please refer to the letterhead).

Very truly yours,

A handwritten signature in blue ink, appearing to read "P. Cavanaugh", with a stylized flourish at the end.

Peter J. Cavanaugh
PJC/jd