



Paul D. Ferreira, C.M., C.S.

Eleuthera Associates, LLC

Expert Witness and Consulting

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Professional Summary

Mr. Ferreira is the owner and general manager of Eleuthera Associates, LLC. and PDF Construction Co. Inc. He has over 40 years of “hands-on” experience in construction, project management, estimating, safety, and cost management related to municipal and state, heavy and highway construction, as well as institutional, commercial, and residential construction. Mr. Ferreira has an extensive working background in excavation, grading, concrete construction, streetscapes, underground utilities (sewer, drainage, and water), roadway and parking lot construction and improvements (landscaping, sidewalks, ramps, grading, paving, and walls), building site excavation, guardrail and fencing, highway and street lighting, traffic signalization, landscaping, roadway signage, pavement striping, traffic control in work zones, DOT traffic control and permitting requirements and pedestrian safety.

Mr. Ferreira possesses diplomas in Construction Management and Construction Safety as well as a variety of industry-specific certifications.

He is highly experienced with the customary documentation, procedures, and communications used in the construction industry, as well as applicable industry standards and methods.

Mr. Ferreira has an extensive background in:

- **Roadway accidents caused by defective pavements and/or other infrastructure deficiencies.**
- **Construction-related accidents – public, commercial, private, and residential sectors**
- **The safe and unsafe operational means and methods practiced in the construction industry**
- **OSHA rules and regulations pertaining to the construction industry**
- **ADA requirements pertaining to walking surfaces and ramps**
- **Slips, trips, and falls resulting from defective pavements and ramps**
- **Work zone and site safety requirements**
- **Pedestrian safety in work zones and finished pavements**
- **ATSSA safe traffic management guidelines**
- **Work zone traffic safety procedures and maintenance and protection of traffic requirements**
- **Construction industry standards**
- **Construction project plans, details, schedules, and specifications**
- **Defective materials and poor workmanship claims**
- **Personal injury and damages resulting from negligent operations**
- **The safe and proper operation of heavy equipment, tools, and trucks**
- **Soil erosion, flooding, and other property damages resulting from poor workmanship or negligence**
- **Predictive site sequencing analysis**
- **Analysis of predictive worker and equipment movements**

Expert witness summary

Mr. Ferreira possesses over 40 years of daily “in the trenches” field experience that provides him the ability to objectively analyze a case based on practical experience, complemented with theoretical knowledge. His **practical experience is what sets him apart** from most other experts in this field.

Over decades, Mr. Ferreira has witnessed established and questionable practices performed. This exposure, combined with his practical experience and expertise, has helped numerous clients settle cases with favorable outcomes. He is available to consult with law firms in all 50 states.

Mr. Ferreira has been retained and consulted on a variety of cases since 2008. He has provided his expertise to Plaintiff and Defendant clients alike, in cases relating to:

- Defective pavements resulting in motor vehicle and truck accidents
- Pavement and walkways slip, trip, and fall, resulting in pedestrian injuries
- Worksite and safety practices, resulting in worker injuries
- Roadway work zone accidents, resulting in worker injuries
- Heavy equipment operation
- The loading and off-loading of construction materials, resulting in injuries
- Personal injury due to lack of work zone pedestrian safety measures
- Worker injury due to temporary stair collapse
- Defective pavements, resulting in a motorcycle crash
- Defective materials and installations
- Property flood damage resulting from negligent maintenance
- Concrete mixer operation resulting in worker injury
- Premises damage and claims due to defective workmanship

Services provided

- Consultation
- Document review
- Assistance with deposition questions
- Analysis and research
- Opinions and reports
- Video or mockup reconstruction, where applicable
- Expert testimony

Education and Licensing

- Licensed Sewer and Water Line Installation Contractor (CT PLM. 0208491), November 1, 2023 – October 31, 2024.
- Commercial driver’s license unlimited Class 1- current for all trucks and trailers.
- Confined Space Training Course - Certificate #847861
- OSHA Campus 360 Training – Accident Investigation Reporting training program
- New York 811 Excavator Training & Education Program – Certificate #4070 - current
- State of Connecticut Department of Administrative Services, Minority Business Enterprise Certification, October 2022 - 2024
- ATSSA certification in Work Zone Safety and Traffic Control Requirements, April 2021
- Member of International Union of Operating Engineers Local 478, 1982 – Present.
- Pipeline Emergency Response and Damage Prevention training program: Paradigm Liaison Services, 2009, 2012, 2013.

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- Pervious Concrete Technician Certification training program: National Ready-Mix Concrete Association
- Construction Management Diploma, with highest honors: Stratford Career Institute, January 10, 2010
- Construction Safety Diploma: Alison Training Courses, 10/2023
- Certification Diploma: University of South Florida, OSHA Training Institute (OSHA 30 - OTI 510) September 6, 2008
- U.S. Army National Guard, 248th Heavy Equipment and Engineers' Division, 1981 – 1987.
- Business major (management, marketing, and economics): Mitchell College, New London, CT, 1984.
- Four-year certificate program including mechanics and blueprint reading. Graduated with honors from Southeastern Regional Technical School, Groton, CT 1977 – 1980.

Continuing education

- Training and Educational Seminars provided by CBYD, Connecticut Department of Transportation, Contractor Safety Classes (Gilbane Company). 1988 – Present.
- Mandatory State of CT DCP Trade Licensing Continuing Education Classes, 1988 – Present.
- New York 811 Excavator Training & Education Certificate Program, completed 1/9/2023
- Accident Investigation Reporting Training Certificate Program, completed 1/10/2023
- Confined Space Training Certificate Program, completed 1/21/2023
- OSHA Campus – Walking and Working Surfaces Training 2/25/2023
- Concrete Truck Operation Certification training course, 9/13/2023
- Heavy Equipment Operator Safety Training (Excavator) 7/11/2023
- Materials Handling & Storage Safety Training 11/02/2023
- Excavation Safety in Construction 11/05/2023
- Compliance Training - Construction Signs, Signals, and Barricades Training 11/25/2023
- Asphalt Institute – Understanding Pavement Distress Training 11/27/2023

Career experience

Eleuthera Associates, LLC Expert Witness and Consulting

Lebanon, CT

Owner/Managing Member, 2008-Present

Responsible for daily operations, development and management of a successful expert witness and litigation support service.

Eleuthera Associates, LLC

Lebanon, CT

Owner/Managing Member, 2008-Present

Responsible for daily “hands-on” operations of a general contracting firm engaged in state, municipal, institutional, and commercial construction. Projects include traffic safety enhancements, roadway, parking lot and site improvements, excavation, underground utilities, concrete, paving, grading, sedimentation and erosion control, traffic signing and control, pedestrian safety and improvements, ADA-compliant improvements, guide rails, traffic signalization improvements, and landscaping improvements.

PDF Construction Co., Inc.

Waterford, CT

Owner, July, 2008 – Present

Corporate Secretary, Construction Manager and Estimator, 1988 – 2008

Responsible for bidding, planning, onsite management, and scheduling all contracts, proposals, and projects. Participated in construction and project meetings, implemented, and monitored construction and safety

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procedures, contract specifications and plans, schedules, and contractual and governmental requirements, as well as working “in the field” with crews. Projects included traffic safety enhancements, roadway improvements, excavation, underground utilities, concrete, paving, grading, sedimentation and erosion control, traffic signing and control, pedestrian safety and improvements, ADA-compliant improvements, guide rails, traffic signalization improvements, and landscaping improvements.

Eleuthera Associates, LLC Investment and Rental Properties

Lebanon, CT

Owner/Managing Member, 2002 – 2007

Responsible for research, acquisition, and rehabilitation of investment and rental properties.

Responsible for implementing budgets, improvement plans, and construction schedules. Secured all required permits, solicited, and negotiated all subcontracts, supervised, and managed trade contractors, and ensured an overall successful project progression.

J. Ferreira Concrete Works & Ferreira Construction Corp.

New London and Salem, CT

Corporate Secretary, Construction Manager and Superintendent, 1980 – 1987

Responsible for managing all aspects of projects from bidding through completion. Responsible for participation in meetings construction and safety procedures, contract specifications and plans, schedules, contractual and governmental requirements, as well as working “in the field” with crews. Projects included traffic safety enhancements, roadway improvements, excavation, underground utilities, concrete, paving, grading, sedimentation and erosion control, traffic signing and control, pedestrian safety and improvements, ADA compliant improvements, guiderails, traffic signalization improvements, and landscaping improvements.