

## Curriculum Vitae

### Paul French III - Director of Litigation and Valuation Services

CPA/ABV/CFF, CGMA, MAFF, CVA, CFE, FCPA, CRFAC, CDBV, ABAR, CPIM, CMEA, CDFA

***“The court has not detailed here the data from which French derived his numbers. Suffice it to say that his research was extensive and well-planned. The court is satisfied that his opinions are defensible under the most rigorous Daubert analysis. See 509 U.S. at 592-95.”*** (The Honorable D. Michael Lynn, United States Bankruptcy Judge; August 4, 2011 Memorandum Opinion Re: June 23, 2011 Village at Camp Bowie I, L.P. Confirmation Hearing.)

Mr. French has testified as an Expert in Federal District, Bankruptcy, and State District Courts and also in arbitration. Mr. French has testified in jury trials in both Federal and State courts. Additionally, Mr. French has been a court appointed Expert, primarily under agreed order, in eight different Texas Counties in capacities including: valuator, auditor, and receiver among others. He has provided deposition and hearing testimony numerous times.

Mr. French’s litigation support engagements include, among others:

- Management financial statement fraud
- Financial misrepresentation in M&A transactions
- Shareholder oppression
- Lost profits and other commercial damages
- Business valuation
- Generally accepted accounting principles
- Opposing Expert’s Report Critique under USPAP Standard 3
- Inventory fraud
- Professional malpractice
- Rebuttal
- Solvency determination
- Fraudulent transfer and preference actions
- Characterization
- Tracing
- Financial misconduct
- Collaborative law
- Fraud on the community
- Uncontested and contested property division
- Mediation and settlement sessions
- Directors and Officers liability

## **Selected Professional Leadership Accomplishments:**

- Elected to the Chairmanship of the Executive Advisory Board of the National Association of Certified Valuators and Analysts (NACVA) (2008/2009), the senior member position of the largest U.S. valuation and forensic credentialing organization.
- Elected to the Chairmanship of American Institute of Certified Public Accountants' (AICPA) Accredited in Business Valuation (ABV) Review Course Taskforce (2008-2010) by the AICPAs' ABV Credential Committee. Responsibilities included all written course material (two volumes) and all sample examinations.
- Named Chairman of the Texas Society of Certified Public Accountants' (TSCPA) Statewide Business Valuation, Forensics and Litigation Services Committee (BVFLS) by the management of the TSCPA (2005-2010). This position represented the senior member position in the state-wide TSCPA BVFLS hierarchy. Led the team that provided meaningful revisions to the Statement on Standards for Valuation Services No. 1 (SSVS No.1) exposure draft that were essentially accepted by the AICPA.
- Named Chairman of the Accredited in Business Appraisal Review (ABAR) Written Credentialing Examination Sub-Committee (2009) by the ABAR Credentialing Committee of the Institute of Business Appraisers. Re-wrote the written credentialing examination.
- Elected to the Chairmanship of the NACVA Litigation and Forensic Board which was the responsible board for all professional credentials now known as the Master Analyst in Financial Forensics (MAFF) (2006-2007). Responsibilities included determining the criteria for awarding the credentials, writing and grading of the majority of the written credentialing examinations during tenure as Chairman.
- Selected as one of eight individuals nationally in NACVA and the Institute of Business Appraisers (2009) to collaborate as the primary authors of the Converged Ethical, Professional and Business Valuation Standards for the two organizations that became effective in 2010. (Mr. French held two professional credentials from each organization at that time.)
- Selected, along with six other members of NACVA, to collaborate as the primary authors of the Ethical, Professional & Business Valuation Standards (2007) for the entire organization that became effective in 2008.
- Selected by the membership to join the then by-invitation-only Business Valuation Discussion Group (BVDG) in approximately 2005. Membership was then comprised of the most highly recognized business valuers, authors, speakers and experts in the United States and Canada.

## Selected Authorship and Speaking Experience:

- Provided 'substantial revisions' to the Association of Certified Fraud Examiner's 2015 Edition of the Fraud Examiners Manual. (*"...we just sent the 2015 Edition of the Fraud Examiners manual to print. The updates you sent us earlier this year were outstanding, and we used them to make substantial revisions to the chapters on Testifying and Report Writing. We also added your name to the list of contributing experts that we acknowledge in the Preface..."* Andi McNeal CFE CPA, Director of Research, Association of Certified Fraud Examiners, 11/4/2014.)
- Authored the 'Determining Enterprise Value' chapter in the peer reviewed text Family Law Services Handbook, The Role of the Financial Expert published by John Wiley & Sons (2011).
- One of the primary authors of the first draft of NACVA's national course, Cornerstone of Financial Forensics (2010) that was the original AICPAs'/Certified in Financial Forensics (CFF) designation examination review course.
- Quoted in one of the foremost nationally published, peer reviewed publication in his fields: Business Valuation Resources' BV Update.
- Elected by his peers across the country to the Editorial Board of the National Litigation Consultants Review Periodical (2007-2010) and published as author or co-author on numerous articles within this peer reviewed publication.
- Awarded the Jeffery R. Salins Report Writing Award for the number one peer reviewed report in all of NACVA for all of 2003 (*"Recipients of this award set the standard to which all others must ultimately rise."*)
- Guest Financial Expert Lecturer on Advanced Trial Advocacy for the American Bar Association, CLE accredited by the State Bar of Texas, approximately 1997, 1999 & 2001.
- Lectured on Business Valuation Standards for the Texas Society of Certified Public Accountants and NACVA, CPE accredited by The Texas State Board of Public Accountancy, in several Texas venues during 2007.
- Named a NACVA Instructor of Exceptional Distinction for 2007. (*"People like you are the givers of the world; you truly care for those you teach. Your dedication to excellence and willingness to share knowledge, experience and wisdom will have a lasting impact on those who have had the privilege to sit in your class."*)
- National instructor for the Master Analyst in Financial Forensics (MAFF), Commercial Damages and Fraud Risk Management written examination preparation courses.
- Presented material at an annual national NACVA conference, approximately 2007.
- Presented or co-presented Continuing Legal Education to numerous Texas Bar Associations (2003-2011) in approximately 5 Texas counties.

### **Current Professional License and Credentials:**

1. Certified Public Accountant (CPA), Texas State Board of Public Accountancy
2. Accredited in Business Valuation (ABV), by the American Institute of Certified Public Accountants (AICPA)
3. Certified in Financial Forensics (CFF), by the AICPA
4. Chartered Global Management Accountant (CGMA) by the AICPA
5. Master Analyst in Financial Forensics (MAFF), by NACVA (1/5/2001) with sub-certifications:
  - Fraud Risk Management,
  - Commercial Damages,
  - Business Valuator Accredited in Litigation, and
  - Business and Intellectual Property Damages
6. Certified Valuation Analyst (CVA) by NACVA (12/16/1996)
7. Certified Fraud Examiner (CFE), by the Association of Certified Fraud Examiners
8. Forensic Certified Public Accountant (FCPA) by the Forensic CPA Society
9. Certified Forensic Accountant (CRFAC) by the American Board of Forensic Accounting
10. Certified in the Valuation of Distressed Businesses (CDBV), by the Association of Insolvency and Reorganization Advisors
11. Accredited in Business Appraisal Review (ABAR), by the Institute of Business Appraisers (4/20/2009)
12. Certified in (Manufacturing) Production and Inventory Management (CPIM), by the American Production and Inventory Control Society (APICS)
13. Certified Machinery and Equipment Appraiser (CMEA), by the NEBB Institute
14. Certified Divorce Financial Analyst (CDFA), by the Institute for Divorce Financial Analysts

### **Prior Education, Work Experience and Selected Responsibilities:**

1. Paul French CPA, (March 1993 through March 2009)
  - Sole practitioner practice primarily focused on litigation support, business turnaround/consulting and business brokerage.
  - Developed a Litigation Support/Testifying Expert business culminating in Court appointments, primarily under agreed orders, in eight or nine Texas Counties and the professional accomplishments and experience mentioned elsewhere in this document.

2. Hospital and Kitchen/Canada/Dallas, (April 1987 through February 1993)
  - Assistant to the Director of the Board, Division General Manager (Indianapolis), Material Director, Vice President and Director of Manufacturing Planning and Logistics (Dallas).
  - Responsible for the day to day manufacturing, planning and inventory control for manufacturing plants in three countries, as well as all logistics in the United States.
  - Implemented MRP II and was a member of the Total Quality Management, Statistical Process Control implementation team.
3. The Perlman-Rocque Company and Havi Corporation, (May 1980 through March 1987)
  - Accounting Manager, Controller, Director of Finance, Assistant Division General Manager, General Manager of two separate divisions and Corporate Marketing Director.
  - Designed and directed the programming and implementation of a Purchasing, Receiving and Inventory Control system that was adopted Company-wide in this \$800 million distributor of McDonald's products.
  - Was the General Manager of the largest food and paper distribution center in the entire McDonalds' restaurant system with \$200+ million sales and 250+ inventory turns per year.
4. Touche Ross & Co (Now Deloitte), Chicago, Illinois (June 1975 through May 1980)
  - Audit Supervisor of one of the largest publically held (NYSE) international clients in the Chicago office.
  - Supervised the audits of the three largest divisions and several smaller divisions at this client, usually several concurrently.
  - Clients included large/medium sized Manufacturing, Distribution, Oil/Gas and others.
  - One of the Chicago office's Statistical Sampling Coordinators, Computer Audit Specialists and a National Instructor of Statistical Sampling for the firm.
  - Significantly reduced audit costs in the Inventory Reserve, Accounts Receivable and Allowance for Doubtful accounts areas by implementing new statistical sampling and computer audit techniques.
5. Western Michigan University, Kalamazoo, Michigan (January 1972 through April 1975)
  - Graduated with a Bachelor of Business Administration, Magna cum laude. Accounting Major, Corporate Finance Minor.
  - Maintained a full course schedule each semester year-round until graduation.
  - Worked a 40+ hour per week in a factory to support my family and school costs during 3 years of my college work. Promoted from machine repairman to Operation Supervisor of the entire plant during my three-year employment.

## Publications Authored in the Previous 10 Years – Paul French

The following publications occurred in the last 10 years.

1. Contributing Expert, Association of Certified Fraud Examiner, The Fraud Examiner's Manual, 15th edition, 2014.
2. Quoted by BVWire, Breaking Out of the Precedence Box in Court, BVWire Issue #151-4, April 22, 2015.
3. Co-Author and Co-Presenter, Chapter 11 Cram Down Interest Rate Determination, Tarrant County Bankruptcy Bar Meeting, February 2012.
4. Co-Author and Co-Presenter, Chapter 11 Cram Down Interest Rate Determination, Dallas County Bankruptcy Bar Meeting, June 2011.
5. Author, "Chapter 14: Determining Enterprise Value", Family Law Services Handbook: The Role of the Financial Expert, John Wiley & Sons, Inc., 2011.
6. Co-Author and Co-Presenter, Certification in Financial Forensics (CFF) Beta Training, National Association of Certified Valuators and Analysts, December 2010.
7. Co-Author, Certification in Financial Forensics (CFF) Review Course, National Association of Certified Valuators and Analysts, September 2010.
8. Author, "Seeing is Believing: Use Demonstratives to Make a Statement Without Saying a Word", National Litigation Consultants' Review, May 2010.
9. Author, "What Judges and Juries Want", National Litigation Consultants' Review, March 2010.

## Testifying Experience in the Previous 4 Years - Paul French

Case No.	Judge	Jurisdiction/Court	Name of Litigants	Retaining Attorney & Law Firm	Date Testimony Given	Deposition, Jury Trial, Bench Trial, Hearing or Arbitration? (D, JT, BT, H, A)
Adv. Pro. No. 16-07002	Tony M. Davis	348th Judicial District Court, Tarrant County, Texas	Arabella Petroleum Company, LLC, Debtor, Case No. 15-70098 (TMD) Morris D. Weiss, Chapter 11 Trustee for Arabella Petroleum Company, LLC, Plaintiff v. Arabella Exploration Inc., Arabella Exploration LLC, Arabella Operating LLC, Trans-Texas Land & Title, LLC, Platinum Partners Credit Opportunities Master Fund LP, Platinum Long Term Growth VIII, LLC and Jason Hoisager, Individually, Defendants	Morris D. Weiss Waller Lansden Dortch & Davis, LLP	11/25/2019	D
348-301848-18	Mike Wallach	348th Judicial District Court, Tarrant County, Texas	Adam Butcher, individually and derivatively, on behalf of Milestone Funds, LP, Plaintiff, v. Robert J. Miles, Defendant	John M. Frick Bennett, Weston, LaJone & Turner, P.C.	11/20/2018	H
233-615832-17	Jerome S. Hennigan	324th District Court Tarrant County, Texas	IMMO Nouman Ali Khan and Sofia Sharieff; and ITIO Khan children	Bruce Turner/John M. Frick Bennett, Weston, LaJone & Turner, P.C.	6/13/2018	BT
10-50713	Robert Summerhays	United States Bankruptcy Court Western District of Louisiana	Gulf Fleet Holdings, Inc., et al; Debtors Alan H. Goodman, Trustee, Plaintiff-in-Interventions vs. H.I.G. Capital, LLC, H.I.G. Gulf Fleet Acquisition, LLC, H.I.G. GP-II, Inc., H.I.G. Capital Partners IV, L.P., H.I.G. Advisors IV, LLC, Gulf Fleet Tiger Acquisition, LLC, Gulf Fleet Tiger Holdings, Inc., Anthony Tamer, Jeff Zaranini, Jonathan Fox, And Steadfast Insurance Company, Defendants-in-Intervention	Hugh M. Ray III Pillsbury Insolvency & Restructuring	10/2/2017	D
01-15-0005-5430	AAA (American Arbitration Association)	NA	National Frozen Distribution Consultants, LLC vs. Hostess Brands, LLC	Douglas Y. Curran Stinson Leonard Street LLP	3/28 - 4/4/2017	A
CC-14-04061-D	Ken Tapscott	County Court at Law No. 4, Dallas County, Texas	Green Chili Foods, Inc., Plaintiff, v. Red Rock Foods LLC, Jeff Maahs, David William Perkins, Brant Seaton, Perkins Brothers Holding Company, LLC, Lance Stephens, & Land Mark Products, Inc., Defendants	Kevin Ganci Ganci, LLP	3/15/2017	D
CC-13-02162-E	Mark Greenberg	County Court At Law No. 5, Dallas County, Texas	Kane Russell Coleman & Logan, P.C., Plaintiff, v. Coral Way, LLC, Defendant, The Vento Entities and DLNGR NR, LLC, Interveners.	Kenneth C. Johnson, Esq. and Catherine E. (Kate) Gaither, Esq. Kane Russell Coleman & Logan, P.C.	9/20/2016	D
4:14-cv-00358-RAS	Amos L. Mazzant	U.S. District Court; Eastern District of Texas Sherman Division	Emerald City Management, LLC and Emerald City Band, Inc., Plaintiffs, v. Jordan Kahn and Jordan Kahn Music Company, LLC, Defendants' Jordan Kahn, Counter-Plaintiff v. Emerald City Management, LLC and Emerald City Band, Inc., Dean "Deno" Taglioli, Counter-Defendants/Third-Party Defendant.	Alan Busch & Robert Ruotolo Busch Ruotolo & Simpson, LLP	2/26/2016	JT