

Michael and Patti Cheikin
 34820 Capstan Lane
 Lewes, DE 19958
 cell 610-639-6034,5
 cheikinm@msn.com patti.cheikin@gmail.com

May 13, 2022

Blake Carey Esq.
 The Smith Firm
 323D Rehoboth Ave.
 Rehoboth, DE 19971
 302-875-5595

see bookmarks for numbered documents

8866 Riverside Dr.
 Seaford, DE 19973

DRAFT SUMMARY (Not fully fleshed out)

9/2019	Purchase a retirement home in Bay Crossing a 55+ community, approx 2200 sq ft. Slab constructions. Our primary residence is in Blue Bell, PA (245 Bradford Cir, Blue Bell PA 19422), which is 120 miles and two hours away.	
middle 2021	Engage BKT (bathkitchenandtiles.com) to design and provide: cabinets, cabinet hardware, flooring, tiles. Also removing some pillars and walls, all non-weight bearing. Contract with BKT signed 10/2021.	can send
	BKT provides list of recommended contractors (Ian McCarty, owner, Coastal Home Experts LLC ("CH") at the top of the list).	document 02
	Engage Doug _____ a Structural Engineer to review site and scope to ensure that all removed components are not weight-bearing.	
Sept-Oct 2021	Several site visits by Ian of CH, reviewing the scope draft documents exchanged and reviewed.	
11/12/2021	Contract and Addendum signed w \$13,000 deposit.	document 03
	Ian tells us he is purchasing a home. In retrospect we believe he used our funds as a down payment.	
Fr 2/9/2022	Receive email from Ian that he's ready to start next week	document 04
Sat 2/10/2022	Meet w Ian to review site and scope with Ian. Provide second installment check of \$20,000.	
Tues 2/15/2022	"Start Date"--demolition begins. As per contract, job to be completed by 4/15/2022. Does not work on site 5 days a week as specified in contract.	
Early April	Attempt to contact Ian regarding delays and deadline. Only can reach his "assistant" Meredith.	
4/11/2022	sent email to Ian after site visit, photos taken	document 05
4/12/2022	receive the attached email and timeline from Ian. This is the last communication from Ian despite multiple emails, phone calls and text messages (many documented).	document 06
4/14/2022	BKT tells us that granite templating takes approx two months to schedule In attempt to mitigate delays, we schedule the template date for 5/26/2022, providing adequate margin for delays.	document 07
4/18/2022	send email response to Ian	document 08
4/15 - 4/30	minimal work done--max of 1-2 days/wk, 3 hours per day	
4/23/2022	send email to Ian, site visit, photos taken	document 09
5/2/2022	Send 1st Certified Letter and email	document 10

	Discover that Ian does not have a General Contractor license. Does have business license and general liability insurance.	
5/9/2022	Send 2nd Certified Letter and email to CEASE and DESIST and remove trailer from driveway.	document 11
5/11	CH does not accept either certified letter but does remove trailer on 5/11 (follows deadline in CEASE letter)	

- We have paid Ian \$33,000 out of a total of \$38,700 (85%). We believe he has done approximately 10-15% of the work.
- Several items have been done incorrectly. This includes cutting into the slab but putting in the wrong size drainpipe into the slab (1.5" instead of 2"), installing wall cabinets before wiring or painting is complete.
- Failed to properly protect several fixtures and window treatments, fireplace, new expensive fans damaged and covered in dust (proper protection was specified in contract),
- Rendered house unusable for the summer season.
- If we miss the templating date of 5/26/2022, the job will be delayed another two months.
- For each day past 4/15, the contract addendum states that will be a penalty of 1% per day, or \$387 per day.
- Contract addendum also shifts legal fees to the prevailing party.
- We have identified another contractor who is trying to get enough done for the templating, but the question of permits and other issues need to be reviewed. New contractor brought a licensed plumber to review site and verified that the new drain pump newly cemented into the slab by CHE is the wrong diameter and needs to be replaced (cutting into the slab a second time).
- Fails to maintain electric to refrigerators, wasting several hundred dollars of fridge and freezer food.
- Leaves on heat, lights when not there from 2/15 onward

DAMAGES

- Paid \$33,000, less than 10-15% of work done, now additional cost to rectify and complete job
- Loss of use of house after 4/15/2022
- Possible need to rent alternate residence for summer
- Cost of second contractor including additional cost for expedited plumber, electrician, trying to meet templating deadline
- Cleaning house
- Repairs to fan, other damages
- Refrigerator food
- Electric and heat left on
- Travel costs and lost time required to document and inspect, to send letters, etc
- Legal costs!



Michael and Patti Cheikin

Enclosures

BKT Bath, Kitchen & Tile Center

Updated 3/9/2022

Coastal Home Experts
Ian McCarty
302-505-6423
Carpentry and Tile, License DE
coastalhomeexpertsllc@gmail.com

Evans Tile, LLC
Lloyd Evans
302-515-4272
Remodeler, Carpentry, Tile
License DE
evanstilellc@gmail.com

McGhee Company
Steve McGhee
302-521-2253
Custom Carpentry, License DE
mcgheecarpentry@verizon.net

Elite Remodeling, LLC
Todd Schroeder
302-988-9737
Remodeler, Carpentry, License DE
tschroeder302@gmail.com

Pierre Tile
Pierra Porier
215-837-7287
Tile, License DE, MD
hdpan@gmail.com

Delway Contracting
Angelo Deapo, JR
302-236-0341
Remodeler, License DE
delwayllc@gmail.com

Martin Services, LLC
Brian Martin
302-462-6235
Custom Homes, Remodel, License DE
bmartin180@gmail.com

Unique Custom Interiors
Damian Richards
302-228-6328
Remodeler, License DE
uncuin@gmail.com

Goodman Home Improvements
Joel Goodman
302-335-6528
Remodeler, License DE
goodmanllc@gmail.com

Sundew Painting
Dino Nardo
302-684-5858
Painting, License DE
sundewsouth@comcast.net

Eastern Shore Painters
Josh Elkins
443-373-3119
Painting, License DE MD
easternshorepainters@gmail.com

Sullivan Home Interior Product Co, Inc
John Sullivan
410-829-4408
Shower Doors and Mirrors
sales.shipco@gmail.com

Dependable Electric
Charlie Hudson
302-877-0770
Electric, License DE, MD
dependableelectrical@live.com

Sherman Corporation
Dave McCloy
302-645-5267
HVAC and Plumbing, License MD, DE
davem@shermancorp.com

COASTAL HOME EXPERTS LLC CHEIKIN HOME REMODEL

11/01/2021

SCOPE OF WORK

1. Project Background and Description

Kitchen Remodel and additional task (site visit by Ian)

This is a proposal from Ian McCarty owner of Coastal Home Experts LLC

License Number #2018102502

Insurance Avery Hall

6199 Kirby rd. Milford De 19963

302-505-6423

CoastalHomeExpertsLLC@gmail.com

2. Project Scope

This project entails

- A full gut and remodel of your current kitchen with Plumbing/gas and Electrical adjustments to suit the new cabinet layout, supplied by Bath Kitchen and Tile. We will be responsible from the start to the final finishing's that make this room complete (this is to include appliance install, trim kit and knobs for cabinetry, backsplash tile and fixtures)*
- The cost to remove the flooring and install new in these rooms. (Kitchen, hall, laundry, living room, lounge room / front door tile) Counting a total of 1,250sqft of flooring:*
- The cost to remove a wall in the living room, lounge room columns / knee wall by front door, remove dividing wall in closet and adjust the doorway on the laundry side to a 48 inch double.*
- Electrical –(front entry room - we are to install 12 new cans in the front entry lounge area on dimmers with lighting aces in the hallway, we are to keep the receptacle on the wall by the front door and add a receptacle in the floor of the lounge area) (laundry/closet – we are to have a receptacles in the closet on the wall opposite of the hall, we are to have light switches to operate the light in this room on both sides of this opening one per room.) (living room – we are to install one receptacle in the floor in the area the couch rest, we are to install a light/fan switch for the living room by the kitchen opening)*

(kitchen – we are to install all new led lights and add 4 more spread out evenly between the kitchen to the dining room, we are to move the fan more centered on the positioning of the dining room table, we are to wire above the island for pendant lights and install, we are to install undermount cabinet lighting on dimmers, we are to move and add electrical outlets as needed for cabinet layout / appliances.

- *Plumbing – we will have to open up the concrete to move your plumbing lines for the new layout, we will be responsible for all your kitchen hook ups and proper function.*
- *The cost to drywall and finish demoed areas*
- *The cost to install barn doors on the lounge side of the closet (double doors) and a single door on the laundry side in the hall*
- *The cost to paint the same rooms we are working in*
- *We are to prep all entry point of other rooms with plastic walls and zippers*
- *We clean up daily on site*
- *We haul trash away daily from site*
- *We request a lock box or key be provided for entry and we request all furniture be moved out of the work area and any other valuables*
- *We request the garage have space for your supplies to be stored such as cabinetry and flooring preferably like a 10x 10 space should work*
- *We would commence all work at once so we can complete the project in phases* subject to provisions in Addendum

3. High-Level Requirements

Electrician

Plumber/gas tech

Carpenter

4. Supply cost and material

- Lumbar \$400.00
- Plumbing \$450.00
- Electrical \$1,900.00
- Drywall and acc. \$580.00
- Paint and acc. 17 gallons walls, 10 gallons ceiling, 3 gallons semigloss \$2,100.00
- Trim base 500 lft \$840.00
- Vent duct count 4 \$130.00

- Vinyl flooring \$ 1,250sqft I would buy 1,300 sqft to be safe
- Screws for cab. And trim nails \$120.00

supply total \$6,520.00

5. Labor Cost

- Demo - kitchen, dividing wall in living room and columns / move closet doorway and remove dividing wall in closet, remove carpet in the hall living room and lounge room and all flooring from entry but no bedrooms and bathrooms \$6,500.00
- Install barn doors \$400.00
- Electrical \$4,200.00
- Plumbing \$1,250.00
- Install drywall and finish \$3,600.00
- Paint all ceilings walls and doors / trim in the rooms we worked in and the flooring goes in \$4,000.00
- Install cabinets(pulls, toe, crown, scribe and fillers) \$5,500.00
- Install backsplash \$1,400.00
- Install appliances \$1,200.00
- Flooring install \$4,250.00

Total : 32,200.00

6. Referrals

Bath Kitchen And Tile

7. High-Level Timeline/Schedule

i Yet to be determined were looking into December / January time supply depending

Total of project expenses: \$38,720.00

Supply deposit due on day of signing \$13,000.00 11/12/21

Amount due on start day \$20,000.00

Final labor payment upon completion \$5,720.00

Start and complete on a 4-5 business week period. February timeline for start

We will continue the job until all is finished as agreed in this proposal / contract

"Addendum to Original Agreement of 11/2/2021" is incorporated herein and made part of this agreement.

Please make checks payable to

Coastal Home Experts

Name	Title	Date
<i>Paul Reed</i>		11/12/21
<i>tax McCarty</i>	Company owner	11/01/2021

All work will be completed as listed above by professionals none the less with a 2 year labor only warranty.

This proposal is good for 30 days, prices may change after this time

If failure to pay final bill after 30 days 10% interest accrue monthly until paid in full

Any add on or need of more supply will be add on to your bill and you will be invoiced under customer agreement and signed documentation.

Thank you for choosing Coastal Home Experts LLC

Addendum to
"Original Agreement" OF 11/2/2021
between
Coastal Home Experts LLC ("Contractor")

and
Michael and Patti Cheikin ("Owners")
34820 Capstan Lane, Lewes DE 19958
(610) 639-6034,5; cheikinm@msn.com, patti.cheikin@gmail.com,

November 6, 2021

Dear Ian,

This Addendum is incorporated into the Agreement of 11/2/2021 as referenced. The terms of this Addendum will prevail over any similar terms in the Original Agreement.

1. Hanging of barn doors on the "middle room" side and by the laundry room. Owners to supply kit and doors; balance of materials and labor included in this proposal.
2. Dimmers must be of Decora or Leviton brand, two-entrance (three-way) lighted dimmer on all switching for middle room, laundry, kitchen, family room, nook. Layout will be reviewed with electrician in advance.
3. Start Date. We understand that all materials necessary to complete the job will be received no later than April 1, 2022. Contractor will not begin the job ("Start Date") until sufficient quantities of materials and labor are available, in Contractor's sole opinion, to complete the job within two calendar months. The Start Date will be no later than April 1, 2022. Contractor will give the Owners one week notice before starting work. If the job is not started by April 1, 2022, all deposits provided will be returned in full within 14 calendar days. The start date can be extended by mutual written consent within 60 days of the execution of this contract in the event of unavailability of required or chosen materials.
4. End Date. The job will be completed no later than two calendar months (e.g. May 31, 2022 for a Start Date of April 1, 2022). If the job is not completed within two months of start date, 1% will be deducted from the total value of the job for each day that the job is not completed. This provision will not apply to any reasonable final "punch list" items that may require additional time to complete. However, final payment will not be made until all punch list items are approved by the Owners, such approval to be reasonably provided.
5. Agents and Sub-Contractors of Contractor. All workers involved in the job, regardless of source, will be properly licensed and insured.
6. Legal Costs. In the event of any legal action, the parties agree that the prevailing party will be entitled to legal and related costs involved in taking such action.

CONTRACTOR

OWNER

Coastal Home Experts LLC

Name: Ian McCarthy

Name: Michael and Patti Cheikin

Sign: 

Sign: 

Date: 11-12-2021

Date: 11/12/21

Re: Getting started!

coastalhomeexpertsllc <coastalhomeexpertsllc@gmail.com>

Tue 2/8/2022 12:08 PM

To: MICHAEL Cheikin <CHEIKINM@msn.com>

Hey mike, received. Let's catch up Saturday some time in the morning if that works for you as well

On Tue, Feb 8, 2022 at 8:55 AM MICHAEL Cheikin <CHEIKINM@msn.com> wrote:

Hi Ian,

We have been moving things but still have a few things to do. Will be down this weekend. Here is a list of what we want to move/save:

1. 5 pieces of furniture in middle room: 3 chairs, ottoman, magazine rack--to front of garage for pickup by re-upholsterer next week
2. Kitchen cabinets and formica for our home in PA, front of garage for us to move.
 - a. 30" sink base including the 3" filler to the left
 - b. long 16" formica counter
 - c. 2 of the 3 33" cabinets under the formica counter (will use as wall cabinets)
 - d. glass shelves
 - e. Inset accent lights in top of wall cabinets
3. Sofa in family room can be moved to the "library"
4. Water is turned off
5. Garage code is 06030
6. If any packages arrive, please put in "library".

I will only be available for 5 minutes this afternoon, seeing patients from 2:00 to 6:30; can talk before or after or tomorrow am.

Please confirm receipt.

Best,

Michael

From: Ian Mccarty <coastalhomeexpertsllc@gmail.com>

Sent: Tuesday, October 26, 2021 7:57 AM

To: MICHAEL Cheikin <cheikinm@msn.com>

Subject: Contract For Renovations Ready For Signature

Good Morning Mike, attached is the contract for renovations. I have adjusted the gas bill and added the flooring in the entryway where there is tile, along with moving the entry knee wall back and column. This will conclude everything to be the final number.

Please let me know how you would like to proceed to the next steps.

we can email/fax documents for signature or we can meet once more in person if you guys have time to come on down to delaware.

Thank you for choosing to work with us and I look forward to catching up with you soon.

Ian McCarty

Cheikin follow-up

MICHAEL Cheikin <cheikinm@msn.com>

Mon 4/11/2022 12:36 PM

To: Ian Mccarty <coastalhomeexpertsllc@gmail.com>

Cc: Patti's Gmail <patti.cheikin@gmail.com>

Hi Ian,

We visited Lewes yesterday Sun 4/10 at 4pm to finalize colors as requested by Meredith in a phone call received on Tues 4/6.

Here's what we found:

1. Pantry cabinet without electric outlet
2. slab cutouts for electric not done, island not placed due to need for hookups.
3. No evidence of gas hookup by Chesapeake Gas.
4. Demolition not complete--house filled with trash piles (no dumpster), laundry room floor not removed.
5. Drywall not complete including walls and ceiling.
6. Slab has some demolition that looks confusing (can send picture)
7. double oven may not fit cabinet
8. heat set to 70 (last worker there on Thursday 4/7)
9. Hood vent not yet cut

You began demolition on Tues 2/15/2022. According to our contract, the job should be completed within 2 months of the start date (other than punch-list). Therefore completion date will be this Friday 4/15.

We will get color choices to you by Wed, though it appears that you will not be ready to paint for at least a few more days unless you plan to bring a large crew to the house over the next few days.

Please address the following by email asap:

1. An update with your plan and timing to complete the job.
2. Please be sure to address the need for an outlet in the pantry cabinet.
3. The widened opening to the kitchen from the hallway looks good but please cut the drywall to the ceiling since the "header" has no purpose and will look better without.
4. BKT recommended that your best guys are Hickory and Dennis. Are either on the job?

Would like to have a phone conversation asap. Please have meredith text in advance so we can set up a time.

Best,
Michael and Patti

Fwd: cheikin timeline for completion.pdf

Meredith Smith <msmith.c.h.e.llc@gmail.com>

Thu 4/14/2022 2:00 AM

To: cheikinm@msn.com <cheikinm@msn.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

----- Forwarded message -----

From: **Ian McCarty** <coastalhomeexpertsllc@gmail.com>

Date: Wed, Apr 13, 2022 at 21:27

Subject: Fwd: cheikin timeline for completion.pdf

To: <msmith.c.h.e.llc@gmail.com>

----- Forwarded message -----

From: **Ian McCarty**

Date: Tue, Apr 12, 2022 at 8:22 PM

Subject: cheikin timeline for completion.pdf

To: <coastalhomeexpertsllc@gmail.com>

<https://acrobat.adobe.com/link/track?uri=urn:aaid:scds:US:153fe34a-46dc-47db-bc1e-30314847f2a7>

Created and shared using Adobe Scan.

[Get the app.](#)

Hello, I have reviewed your email,

As stated in last phone calls of week prior and now email so we have documentation, I am sorry for the lack of time being spent on your project. We have not started any new projects until we are caught up on open jobs and customers are satisfied and contracts are completed, this including yours. You have not been forgotten but yes we did prioritize people who have had homes being worked on and living in there home during construction, this is not out of judgment or disrespect to you and your wife but trying to help the distressed customers who can't function because they have no kitchen or bathrooms in there home.

We are doing are best with the man power we have and time we are given day to day and have been working many many hours every week and trying to keep in touch with everyone and everything. There are many people that come together to make these projects happen and become complete.

Now due to the past five to six weeks we have had to let go of a good amount of workers and pick up/ fix the dirty messes they have created and now left behind. No this is not an excuse I expect to be understood for everyone is worried about their own homes and projects, but none the less doing my best to keep on track and catch up so we can get your home along with just a few others completed and back on your feet.

There is a timeline included in this email I feel we can complete on, not including backsplash and sink/dishwasher hook up but everything else agreed on in contract.

Q/A

Yes there is trash on site, we are not having dumpsters dropped off in your driveway for we have our own dump trailer and you live in a HOA we do not want any complaints.

We will have the trash moved away this week and weekly from now on as we work. Being spread out we are limited to what trucks and trailers are on what sites.

We will take the doorway to the kitchen from the hall and open it up to the ceiling

The concrete needs to be busted out to have water lines and electrical moved for island positioning then we will fill back in, timeline attached will give you more in-site to when this happens and what happens next.

Gas will not be touched until the time comes for the top hook up. There is nothing that can be done with the gas as of right now.

Your local home provider is who is hooking up your gas(Chesapeake gas and utilities)

Hood has not been worked on yet and vent has not been ran yet.

This is an open job site and is expected to have some material and trash about as we move around completing tasks but we are aware it needs to be thrown away.

I do not want to have another phone call about progress because it is unfortunate and I am sorry. I am more than willing to answer any further questions involving the job as long as it isn't a beat down party for I have had enough calls from everyone these past couple weeks and can't take it anymore, I can move forward on my timeline for completion or if you want me to I can stop work it is your call but I would like to complete the job for you and move on, the product left behind is always beautiful and I am doing all the work on your job myself with helpers, I am always the one there and I trust the workers I do have that's why I have kept them.

I can't express enough that I feel bad you got wrapped up in this nightmare we are going through. Nobody expected any of these things to happen.

Please review the timeline and email back for documentation.

Thank you

Ian McCarty

Coastal Home Experts LLC

Checkin Timeline

18-22

25-29

~~7-22~~ April

punch list timeline may 2-6 Complete

April-18-Island lines moved • Drywall

-19 - Fill island floor, Drywall

-20 Finish Cabinets, Finish Dry wall

-21 Plastic Cabinets & paint

-22 Paint

-25 Flooring

-26 Flooring, Base, Trim

-27 Trim, Caulk & paint trim

-28 Hood install, Knobs & Pulls, Adjust Cab

-29 Barn Doors, Finish List of objectives

May-2 to 6 open for punch list.

Backsplash will be completed after tops installed along with hook ups

FW: Products

Pat Tancredi <tancredip@bathkitchenandtile.com>

Thu 4/14/2022 12:50 PM

To: MICHAEL Cheikin <CHEIKINM@msn.com>; Patti Cheikin <patti.cheikin@gmail.com>

📎 2 attachments (549 KB)

CHEIKIN 3.30.pdf; CHEIKIN FIRST DEL.pdf;

after templating done, takes 2 wks for fabrication;
backsplash and other finishing cannot be
completed until granite in place

Also, templating is 5 weeks out. I have asked the shop to put you on the schedule

From: Pat Tancredi

Sent: Thursday, April 14, 2022 11:46 AM

To: 'MICHAEL Cheikin' <CHEIKINM@msn.com>; Patti Cheikin <patti.cheikin@gmail.com>

Subject: Products

Hello

Have you been able to go thru the last delivery of hardware and tile? Attached are the pick tickets for each – please use to inventory your deliveries.

Here is the situation, I want to see this thru before I leave Friday 4/22. I have resigned – looking for part-time, less stressful employment.

You will be on my TURN OVER sheet for our Regional Showroom Manager, Chrystal Hess.

Let me know please.

Pat Tancredi

Kitchen and Bath Designer Assistant



BathKitchen&Tile

Phone: (302) 684-5691

Web: www.bathkitchenandtile.com

Address: 26836 Lewes Georgetown Hwy, Harbeson, DE 19951

Re: cheikin timeline for completion.pdf

MICHAEL Cheikin <CHEIKINM@msn.com>

Mon 4/18/2022 8:36 AM

To: Meredith Smith <msmith.c.h.e.llc@gmail.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

Hi Ian,

We have reviewed your email received from Meredith on 4/14 and understand your situation. Please stay healthy. As we have stated, we want "right, not rushed" and certainly would prefer quality and no shortcuts.

We are willing to extend the deadline from 4/15 till 5/25, the date BKT is scheduled to make the template, ONLY IF all work is done to our satisfaction. Clearly some parts of the job cannot be completed until after the granite is put in place. We are unclear of when the granite will be delivered and then when the job will be fully complete. We will not waive the 1% per day provision after 4/15 at this time, but we will be willing to consider adjusting this figure when we see how and when the final job is completed.

Your email did not address your plan regarding two items in my prior email of 4/12, specifically,

1. No outlet in the pantry cabinet
2. Fitting the double-oven into the cabinet (very very tight or not do-able?)

According to your timeline, you will begin work today, 4/18. We will be visiting Lewes this Fri or Sat to review the progress--will be glad to meet if helpful.

We expect regular communication by email at least weekly from you, including photos of your progress. That means an email by Saturday every week.

Please acknowledge receipt of this email and your plan regarding the two items above.

Sincerely,
Michael and Patti Cheikin

From: Meredith Smith <msmith.c.h.e.llc@gmail.com>**Sent:** Thursday, April 14, 2022 1:59 AM**To:** cheikinm@msn.com <cheikinm@msn.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>**Cc:** imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>**Subject:** Fwd: cheikin timeline for completion.pdf

----- Forwarded message -----

From: Ian McCarty <coastalhomeexpertsllc@gmail.com>**Date:** Wed, Apr 13, 2022 at 21:27**Subject:** Fwd: cheikin timeline for completion.pdf**To:** <msmith.c.h.e.llc@gmail.com>

cheikin follow-up

MICHAEL Cheikin <cheikinm@msn.com>

Sat 4/23/2022 11:23 AM

To: Meredith Smith <msmith.c.h.e.llc@gmail.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

Hi Ian,

Please be sure to respond to this email today to avoid any negative consequences. I did not receive a response to my email of Monday 4/18 and Patti texted Meredith twice this week without a response. You did not follow the work schedule that you sent last week. Your crew worked at the house only once this week, perhaps a second time for 30 minutes.

We want the remainder of this process to go as pleasantly as possible. My email of 4/18 outlined a very fair and generous way to get this job completed.

Based on my experience as a business owner and physician, I can tell you that most law suits come from failure to properly communicate. This is true for you. If you set honest expectations (i.e. make a schedule you can follow) and prioritize proper communication you will avoid further bad reviews and legal costs. It will improve your status in your community and decrease your stress.

We are headed to Lewes now to finalize colors and look further at the tiles. We expect you to meet or at least call us while we are there. I will send a text when we are 30 minutes away. We expect to arrive somewhere around 1:30-2:00.

Once we are forced to engage a lawyer, your costs and stress will go up. Please do the right thing and meet or call us today.

Sincerely,
Michael Cheikin MD

From: MICHAEL Cheikin <CHEIKINM@msn.com>

Sent: Monday, April 18, 2022 8:36 AM

To: Meredith Smith <msmith.c.h.e.llc@gmail.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

Subject: Re: cheikin timeline for completion.pdf

Hi Ian,

We have reviewed your email received from Meredith on 4/14 and understand your situation. Please stay healthy. As we have stated, we want "right, not rushed" and certainly would prefer quality and no shortcuts.

We are willing to extend the deadline from 4/15 till 5/25, the date BKT is scheduled to make the template, ONLY IF all work is done to our satisfaction. Clearly some parts of the job cannot be completed until after the granite is put in place. We are unclear of when the granite will be delivered and then when the job will be fully complete. We will not waive the 1% per day provision after 4/15 at this time,

Michael and Patti Cheikin
34820 Capstan Lane
Lewes, DE 19958
cell 610-639-6034,5
cheikinm@msn.com patti.cheikin@gmail.com

May 2, 2022

Ian McCarty, owner
Coastal Home Experts LLC
6199 Kirby Rd.
Milford DE 19963
302-505-6423
License Number #2018102502

Certified # 7009 1410 0000 7062 2881

Dear Ian:

We have not heard from you since the email you sent on 4/12 (in response to our 4/11 email) with an updated timeline. We have sent you two emails, enclosed, on 4/18 and 4/23 the contents of which are not reiterated in this letter, and which were which unanswered. Text messages to Meredith on 4/19, 4/22, 4/23 and 4/28 were unanswered. Patti also left voice mails on your number 302-505-6423 on 4/20, 4/23 and 4/28 which were also unanswered. We have been extraordinarily patient and trusting and are extremely disappointed in your conduct. We can no longer tolerate the lack of communication and minimal work at our house. **We know you have the capability to do the job; please get it done.**

This certified letter will serve as addition proof of our numerous attempts to communicate with you.

You were only on the site on 4/25 and 4/26 for less than half a day each. The week before, you were only on the site on 4/20 and briefly on 4/21. This is clearly a breach of the contract in which you provided the following language:

Start and complete on a 4-5 business week period...

We will continue the job until all is finished as agreed in this proposal / contract.

We again urge you to communicate with us ASAP and provide an accurate timeline for completion.

If the site is not ready for templating of the granite on Thursday May 26, we you will be replaced as our contractor and we will begin legal proceedings.

This letter will also serve notice that you and your agents will not be permitted any further access to our home after May 26 unless we grant permission in writing.

We urge you to create a win-win by working cooperatively with us to fulfill the contract.

Sincerely,

Michael and Patti Cheikin

Encl: emails 4/11, 4/12, 4/18 and 4/23
revised timeline sent by you 4/12

documents in chronological order

Cheikin follow-up

MICHAEL Cheikin <cheikinm@msn.com>

Mon 4/11/2022 12:36 PM

To: Ian Mccarty <coastalhomeexpertsllc@gmail.com>

Cc: Patti's Gmail <patti.cheikin@gmail.com>

Hi Ian,

We visited Lewes yesterday Sun 4/10 at 4pm to finalize colors as requested by Meredith in a phone call received on Tues 4/6.

Here's what we found:

1. Pantry cabinet without electric outlet
2. slab cutouts for electric not done, island not placed due to need for hookups.
3. No evidence of gas hookup by Chesapeake Gas.
4. Demolition not complete--house filled with trash piles (no dumpster), laundry room floor not removed.
5. Drywall not complete including walls and ceiling.
6. Slab has some demolition that looks confusing (can send picture)
7. double oven may not fit cabinet
8. heat set to 70 (last worker there on Thursday 4/7)
9. Hood vent not yet cut

You began demolition on Tues 2/15/2022. According to our contract, the job should be completed within 2 months of the start date (other than punch-list). Therefore completion date will be this Friday 4/15.

We will get color choices to you by Wed, though it appears that you will not be ready to paint for at least a few more days unless you plan to bring a large crew to the house over the next few days.

Please address the following by email asap:

1. An update with your plan and timing to complete the job.
2. Please be sure to address the need for an outlet in the pantry cabinet.
3. The widened opening to the kitchen from the hallway looks good but please cut the drywall to the ceiling since the "header" has no purpose and will look better without.
4. BKT recommended that your best guys are Hickory and Dennis. Are either on the job?

Would like to have a phone conversation asap. Please have meredith text in advance so we can set up a time.

Best,
Michael and Patti

4/12 email from ian, 2 pages

Fwd: cheikin timeline for completion.pdf

Meredith Smith <msmith.c.h.e.llc@gmail.com>

Thu 4/14/2022 2:00 AM

To: cheikinm@msn.com <cheikinm@msn.com>;patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

----- Forwarded message -----

From: **Ian McCarty** <coastalhomeexpertsllc@gmail.com>

Date: Wed, Apr 13, 2022 at 21:27

Subject: Fwd: cheikin timeline for completion.pdf

To: <msmith.c.h.e.llc@gmail.com>

----- Forwarded message -----

From: **Ian McCarty**

Date: Tue, Apr 12, 2022 at 8:22 PM

Subject: cheikin timeline for completion.pdf

To: <coastalhomeexpertsllc@gmail.com>

<https://acrobat.adobe.com/link/track?uri=urn:aaid:scds:US:153fe34a-46dc-47db-bc1e-30314847f2a7>

Created and shared using Adobe Scan.

[Get the app.](#)

Hello, I have reviewed your email,

As stated in last phone calls of week prior and now email so we have documentation, I am sorry for the lack of time being spent on your project. We have not started any new projects until we are caught up on open jobs and customers are satisfied and contracts are completed, this including yours. You have not been forgotten but yes we did prioritize people who have had homes being worked on and living in there home during construction, this is not out of judgment or disrespect to you and your wife but trying to help the distressed customers who can't function because they have no kitchen or bathrooms in there home.

We are doing are best with the man power we have and time we are given day to day and have been working many many hours every week and trying to keep in touch with everyone and everything. There are many people that come together to make these projects happen and become complete.

Now due to the past five to six weeks we have had to let go of a good amount of workers and pick up/ fix the dirty messes they have created and now left behind. No this is not an excuse I expect to be understood for everyone is worried about their own homes and projects, but none the less doing my best to keep on track and catch up so we can get your home along with just a few others completed and back on your feet.

There is a timeline included in this email I feel we can complete on, not including backsplash and sink/dishwasher hook up but everything else agreed on in contract.

Q/A

Yes there is trash on site, we are not having dumpsters dropped off in your driveway for we have our own dump trailer and you live in a HOA we do not want any complaints.

We will have the trash moved away this week and weekly from now on as we work. Being spread out we are limited to what trucks and trailers are on what sites.

We will take the doorway to the kitchen from the hall and open it up to the ceiling

The concrete needs to be busted out to have water lines and electrical moved for island positioning then we will fill back in, timeline attached will give you more in-site to when this happens and what happens next.

Gas will not be touched until the time comes for the top hook up. There is nothing that can be done with the gas as of right now.

Your local home provider is who is hooking up your gas(Chesapeake gas and utilities)

Hood has not been worked on yet and vent has not been ran yet.

This is an open job site and is expected to have some material and trash about as we move around completing tasks but we are aware it needs to be thrown away.

I do not want to have another phone call about progress because it is unfortunate and I am sorry. I am more than willing to answer any further questions involving the job as long as it isn't a beat down party for I have had enough calls from everyone these past couple weeks and can't take it anymore, I can move forward on my timeline for completion or if you want me to I can stop work it is your call but I would like to complete the job for you and move on, the product left behind is always beautiful and I am doing all the work on your job myself with helpers, I am always the one there and I trust the workers I do have that's why I have kept them.

I can't express enough that I feel bad you got wrapped up in this nightmare we are going through. Nobody expected any of these things to happen.

Please review the timeline and email back for documentation.

Thank you

Ian McCarty

Coastal Home Experts LLC

Chicken Timeline

18-22

25-29

~~7-12~~ April

punch list timeline May 2-6 Complete

April-18-Island lines moved • Drywall

- 19 - Fill island floor, Drywall
- 20 Finish Cabinets, Finish Drywall
- 21 Plastic Cabinets & paint
- 22 Paint
- 25 Flooring
- 26 Flooring, Base, Trim
- 27 Trim, Caulk & paint trim
- 28 Hood install, Knobs & Pulls, Adjust Cab
- 29 Barn Doors, Finish List of objectives

May-2 to 6 open for punch list.

Backsplash will be completed after tops installed along with hook ups

Re: cheikin timeline for completion.pdf

MICHAEL Cheikin <CHEIKINM@msn.com>

Mon 4/18/2022 8:36 AM

To: Meredith Smith <msmith.c.h.e.llc@gmail.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

Hi Ian,

We have reviewed your email received from Meredith on 4/14 and understand your situation. Please stay healthy. As we have stated, we want "right, not rushed" and certainly would prefer quality and no shortcuts.

We are willing to extend the deadline from 4/15 till 5/25, the date BKT is scheduled to make the template, ONLY IF all work is done to our satisfaction. Clearly some parts of the job cannot be completed until after the granite is put in place. We are unclear of when the granite will be delivered and then when the job will be fully complete. We will not waive the 1% per day provision after 4/15 at this time, but we will be willing to consider adjusting this figure when we see how and when the final job is completed.

Your email did not address your plan regarding two items in my prior email of 4/12, specifically,

1. No outlet in the pantry cabinet
2. Fitting the double-oven into the cabinet (very very tight or not do-able?)

According to your timeline, you will begin work today, 4/18. We will be visiting Lewes this Fri or Sat to review the progress--will be glad to meet if helpful.

We expect regular communication by email at least weekly from you, including photos of your progress. That means an email by Saturday every week.

Please acknowledge receipt of this email and your plan regarding the two items above.

Sincerely,
Michael and Patti Cheikin

From: Meredith Smith <msmith.c.h.e.llc@gmail.com>**Sent:** Thursday, April 14, 2022 1:59 AM**To:** cheikinm@msn.com <cheikinm@msn.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>**Cc:** imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>**Subject:** Fwd: cheikin timeline for completion.pdf

----- Forwarded message -----

From: Ian McCarty <coastalhomeexpertslc@gmail.com>**Date:** Wed, Apr 13, 2022 at 21:27**Subject:** Fwd: cheikin timeline for completion.pdf**To:** <msmith.c.h.e.llc@gmail.com>

cheikin follow-up

MICHAEL Cheikin <cheikinm@msn.com>

Sat 4/23/2022 11:23 AM

To: Meredith Smith <msmith.c.h.e.llc@gmail.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

Hi Ian,

Please be sure to respond to this email today to avoid any negative consequences. I did not receive a response to my email of Monday 4/18 and Patti texted Meredith twice this week without a response. You did not follow the work schedule that you sent last week. Your crew worked at the house only once this week, perhaps a second time for 30 minutes.

We want the remainder of this process to go as pleasantly as possible. My email of 4/18 outlined a very fair and generous way to get this job completed.

Based on my experience as a business owner and physician, I can tell you that most law suits come from failure to properly communicate. This is true for you. If you set honest expectations (i.e. make a schedule you can follow) and prioritize proper communication you will avoid further bad reviews and legal costs. It will improve your status in your community and decrease your stress.

We are headed to Lewes now to finalize colors and look further at the tiles. We expect you to meet or at least call us while we are there. I will send a text when we are 30 minutes away. We expect to arrive somewhere around 1:30-2:00.

Once we are forced to engage a lawyer, your costs and stress will go up. Please do the right thing and meet or call us today.

Sincerely,
Michael Cheikin MD

From: MICHAEL Cheikin <CHEIKINM@msn.com>

Sent: Monday, April 18, 2022 8:36 AM

To: Meredith Smith <msmith.c.h.e.llc@gmail.com>; patti.cheikin@gmail.com <patti.cheikin@gmail.com>

Cc: imccarty.c.h.e.llc@gmail.com <imccarty.c.h.e.llc@gmail.com>

Subject: Re: cheikin timeline for completion.pdf

Hi Ian,

We have reviewed your email received from Meredith on 4/14 and understand your situation. Please stay healthy. As we have stated, we want "right, not rushed" and certainly would prefer quality and no shortcuts.

We are willing to extend the deadline from 4/15 till 5/25, the date BKT is scheduled to make the template, ONLY IF all work is done to our satisfaction. Clearly some parts of the job cannot be completed until after the granite is put in place. We are unclear of when the granite will be delivered and then when the job will be fully complete. We will not waive the 1% per day provision after 4/15 at this time,

Michael and Patti Cheikin

34820 Capstan Lanee

Lewes, DE 19958

cell 610-639-6034,5

cheikinm@msn.com patti.cheikin@gmail.com

May 9, 2022

Ian McCarty, owner
Coastal Home Experts LLC
6199 Kirby Rd.
Milford DE 19963
302-505-6423

CERTIFIED MAIL: 7009 1410 0000 7062 2805

CERTIFIED MAIL, EMAIL AND HAND DELIVERED

CEASE AND DECIST

To Ian McCarty:

We have discovered that you are not a registered General Contractor. You have not communicated with us in almost a month and have breached our contract.

You may no longer enter or do any work on our property. You do not have permission to leave your trailer on our driveway.

You must remove your trailer from our property by Noon on Wednesday May 11 2022 Noon (48 hours from this email/letter) or we will have it removed.

Sincerely,



Michael and Patti Cheikin