

Wrongful Death Economic Damages Report of Adult Male

Plaintiff v. Defendant

Case No. 12345

Name	Adult Male	Statistical Life Expectancy	50.1
Sex	Male	Age at End of Life Expectancy	75.2
Race	White	End of Life Date	11/7/2071
Birthdate	09/12/1996	End of Life Year Fraction	0.77
Injury Date	10/01/2021	Educational Attainment	High School Diploma
Valuation Date	01/31/2024	Statistical Worklife Expectancy	33.5
Assumed Trial Date	01/31/2024	End of Worklife Date	4/1/2055
Age at Injury	25.1	End of Worklife Year Fraction	0.17
Injury Year Fraction	0.25	Discount Rate	2.96%
Trial Year Fraction	0.08		

Damages Summary				
Present Values				
Period of Damage	Pre-Trial	Post-Trial	Total	Running Total
Loss of Earning Capacity	36,316	716,005	752,322	752,000
Loss of Fringe Benefits	22,742	354,654	377,396	1,130,000
Lost Production of Household Services	20,209	515,455	535,664	1,665,000
Total Damages	79,267	1,586,114	1,665,382	
Rounded			1,665,000	

This report was prepared for Law Firm since economic damages are alleged by the plaintiff in this matter. Based on my study of the facts and information made available to me, along with my analytical review procedures, I have concluded that the economic damages suffered by the plaintiff as a result of the alleged wrongful death of Adult Male is \$1,665,000; however, I give no opinion as to whether the plaintiff is entitled to any damages. The damages consist of the present values of the loss of earning capacity and loss of fringe benefits as an Automotive Service Technician and Mechanic working in the Jackson, TN MSA over a statistical worklife expectancy, and loss of production of household services over a statistical life expectancy.

I have performed an analysis that I believe is in conformity with the Statement on Standards for Forensic Services No. 1 (SSFS) from the American Institute of Certified Public Accountants (AICPA) and the Statement of Ethical Principles and Principles of Professional Practice from the National Association of Forensic Economics (NAFE). The damages are within a reasonable degree of accounting and economic certainty.

The professionals who worked on this engagement have no present or contemplated future interest in the client, or any personal interest with respect to the parties involved, or any other interest that might prevent us from performing an unbiased opinion. All compensation paid to FVS is fee-based only and is not contingent upon the development or reporting of a predetermined damage value, the attainment of a stipulated result or the occurrence of a subsequent event directly related to the intended use of this report.

I reserve the right to amend the report if information or documents come to my attention in the future that may alter my opinions. I also reserve the right to use all information referenced in this report and any corresponding demonstrative aids in connection with any testimony I may give in this matter.

Robert Vance, CPA, ABV, CFF, CVA
Forensic & Valuation Services, PLC
8556 Festival Loop, Chattanooga, TN 37419
January 31, 2024

Loss of Earning Capacity, Fringe Benefits, & Household Services

Exhibit A

Pre-Trial					Loss of Earning Capacity								Loss of Fringe Benefits		Lost Production of Household Services		Total Annual Loss	
Year Ending	Age	Pres. Value Year	Earnings Growth	Discount Rate	Would Have Earned Exhibit E	Did/Will Earn	Personal		Net Year Earnings Fractions	Net Earnings Loss	Present Value	Benefit Loss Exhibit B	Present Value	Services Loss Exhibit C	Present Value	Total Loss	Present Value	
							Gross Earnings	Maintenance Exhibit D										
12/31/2021	25	0.0	0.00%	0.0%	37,500	0	37,500	(22,529)	14,971	0.25	3,743	3,743	2,344	2,344	2,063	2,063	8,150	8,150
12/31/2022	26	0.0	3.00%	0.0%	38,625	0	38,625	(23,205)	15,420	1.00	15,420	15,420	9,656	9,656	8,560	8,560	33,636	33,636
12/31/2023	27	0.0	3.00%	0.0%	39,784	0	39,784	(23,901)	15,883	1.00	15,883	15,883	9,946	9,946	8,876	8,876	34,705	34,705
01/31/2024	28	0.0	0.00%	0.0%	39,784	0	39,784	(23,901)	15,883	0.08	1,271	1,271	796	796	710	710	2,776	2,776
Total Pre-Trial					155,693	0	155,693	(93,536)	62,157		36,316	36,316	22,742	22,742	20,209	20,209	79,267	79,267

Post-Trial																					
01/31/2025	28	0.5	3.00%	2.96%	45,910	0	45,910	(22,738)	23,172	1.00	23,172	22,836	11,478	11,311	9,207	9,074	43,857	43,221			
01/31/2026	29	1.5	3.00%	2.96%	47,287	0	47,287	(23,420)	23,867	1.00	23,867	22,845	11,822	11,316	9,546	9,137	45,235	43,298			
01/31/2027	30	2.5	3.00%	2.96%	48,706	0	48,706	(24,123)	24,583	1.00	24,583	22,854	12,177	11,320	9,900	9,204	46,660	43,378			
01/31/2028	31	3.5	3.00%	2.96%	50,167	0	50,167	(24,847)	25,320	1.00	25,320	22,863	12,542	11,324	10,268	9,271	48,130	43,458			
01/31/2029	32	4.5	3.00%	2.96%	51,672	0	51,672	(25,592)	26,080	1.00	26,080	22,872	12,918	11,329	10,650	9,340	49,648	43,540			
01/31/2030	33	5.5	3.00%	2.96%	53,222	0	53,222	(26,360)	26,862	1.00	26,862	22,880	13,306	11,333	11,046	9,409	51,214	43,622			
01/31/2031	34	6.5	3.00%	2.96%	54,819	0	54,819	(27,151)	27,668	1.00	27,668	22,889	13,705	11,338	11,456	9,477	52,829	43,704			
01/31/2032	35	7.5	3.00%	2.96%	56,464	0	56,464	(27,965)	28,499	1.00	28,499	22,899	14,116	11,342	11,881	9,546	54,496	43,788			
01/31/2033	36	8.5	3.00%	2.96%	58,158	0	58,158	(28,804)	29,354	1.00	29,354	22,908	14,540	11,347	12,319	9,614	56,213	43,868			
01/31/2034	37	9.5	3.00%	2.96%	59,903	0	59,903	(29,669)	30,234	1.00	30,234	22,916	14,976	11,351	12,777	9,685	57,987	43,952			
01/31/2035	38	10.5	3.00%	2.96%	61,700	0	61,700	(30,559)	31,141	1.00	31,141	22,925	15,425	11,355	13,249	9,754	59,815	44,034			
01/31/2036	39	11.5	3.00%	2.96%	63,551	0	63,551	(31,476)	32,075	1.00	32,075	22,934	15,888	11,360	13,739	9,824	61,702	44,117			
01/31/2037	40	12.5	3.00%	2.96%	65,458	0	65,458	(32,420)	33,038	1.00	33,038	22,943	16,365	11,364	14,248	9,895	63,651	44,202			
01/31/2038	41	13.5	3.00%	2.96%	67,422	0	67,422	(33,393)	34,029	1.00	34,029	22,952	16,856	11,369	14,777	9,967	65,662	44,288			
01/31/2039	42	14.5	3.00%	2.96%	69,445	0	69,445	(34,395)	35,050	1.00	35,050	22,961	17,361	11,373	15,324	10,039	67,735	44,373			
01/31/2040	43	15.5	3.00%	2.96%	71,528	0	71,528	(35,426)	36,102	1.00	36,102	22,970	17,882	11,378	15,890	10,110	69,874	44,458			
01/31/2041	44	16.5	3.00%	2.96%	73,674	0	73,674	(36,489)	37,185	1.00	37,185	22,979	18,419	11,382	16,479	10,184	72,083	44,545			
01/31/2042	45	17.5	3.00%	2.96%	75,884	0	75,884	(37,584)	38,300	1.00	38,300	22,988	18,971	11,387	17,088	10,256	74,359	44,631			
01/31/2043	46	18.5	3.00%	2.96%	78,161	0	78,161	(38,712)	39,449	1.00	39,449	22,997	19,540	11,391	17,720	10,330	76,709	44,718			
01/31/2044	47	19.5	3.00%	2.96%	80,506	0	80,506	(39,873)	40,633	1.00	40,633	23,006	20,127	11,395	18,375	10,404	79,135	44,805			
01/31/2045	48	20.5	3.00%	2.96%	82,921	0	82,921	(41,069)	41,852	1.00	41,852	23,015	20,730	11,400	19,054	10,478	81,636	44,893			
01/31/2046	49	21.5	3.00%	2.96%	85,409	0	85,409	(42,301)	43,108	1.00	43,108	23,024	21,352	11,404	19,762	10,555	84,222	44,984			
01/31/2047	50	22.5	3.00%	2.96%	87,971	0	87,971	(43,570)	44,401	1.00	44,401	23,033	21,993	11,409	20,493	10,631	86,887	45,072			
01/31/2048	51	23.5	3.00%	2.96%	90,610	0	90,610	(44,877)	45,733	1.00	45,733	23,042	22,653	11,413	21,252	10,708	89,638	45,163			
01/31/2049	52	24.5	3.00%	2.96%	93,328	0	93,328	(46,223)	47,105	1.00	47,105	23,051	23,332	11,418	22,040	10,785	92,477	45,254			
01/31/2050	53	25.5	3.00%	2.96%	96,128	0	96,128	(47,610)	48,518	1.00	48,518	23,060	24,032	11,422	22,856	10,863	95,406	45,345			
01/31/2051	54	26.5	3.00%	2.96%	99,012	0	99,012	(49,039)	49,973	1.00	49,973	23,068	24,753	11,426	23,700	10,940	98,426	45,435			
01/31/2052	55	27.5	3.00%	2.96%	101,982	0	101,982	(50,510)	51,472	1.00	51,472	23,077	25,496	11,431	24,577	11,019	101,545	45,527			
01/31/2053	56	28.5	3.00%	2.96%	105,041	0	105,041	(52,025)	53,016	1.00	53,016	23,086	26,260	11,435	25,488	11,099	104,764	45,620			
01/31/2054	57	29.5	3.00%	2.96%	108,192	0	108,192	(53,585)	54,607	1.00	54,607	23,095	27,048	11,440	26,431	11,179	108,086	45,714			
01/31/2055	58	30.5	3.00%	2.96%	111,438	0	111,438	(55,193)	56,245	1.00	56,245	23,104	27,860	11,444	27,412	11,260	111,517	45,809			
01/31/2056	59	31.5	3.00%	2.96%	114,781	0	114,781	(56,849)	57,932	0.17	9,848	3,929	27,860	11,444	27,412	11,260	111,517	45,809			
01/31/2057	60	32.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	4,878	1,946	28,426	11,341	43,153	17,217			
01/31/2058	61	33.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	29,478	11,423	29,478	11,423			
01/31/2059	62	34.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	30,567	11,504	30,567	11,504			
01/31/2060	63	35.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	31,699	11,587	31,699	11,587			
01/31/2061	64	36.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	32,874	11,671	32,874	11,671			
					0	0	0	0	0	1.00	0	0	0	0	34,091	11,755	34,091	11,755			

01/31/2062	65	37.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	35,355	11,841	35,355	11,841
01/31/2063	66	38.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	36,666	11,927	36,666	11,927
01/31/2064	67	39.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	38,024	12,013	38,024	12,013
01/31/2065	68	40.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	39,434	12,100	39,434	12,100
01/31/2066	69	41.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	40,896	12,188	40,896	12,188
01/31/2067	70	42.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	42,410	12,276	42,410	12,276
01/31/2068	71	43.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	43,981	12,365	43,981	12,365
01/31/2069	72	44.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	45,608	12,453	45,608	12,453
01/31/2070	73	45.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	47,297	12,543	47,297	12,543
01/31/2071	74	46.5	0.00%	2.96%	0	0	0	0	0	1.00	0	0	0	0	49,046	12,633	49,046	12,633
11/07/2071	75	47.5	0.00%	2.96%	0	0	0	0	0	0.77	0	0	0	0	39,164	9,798	39,164	9,798
Total Post-Trial					2,410,450	0	2,410,450	(1,193,847)	1,216,603		1,168,519	716,005	578,795	354,654	1,164,020	515,455	2,911,335	1,586,114
Grand Totals					2,566,143	0	2,566,143	(1,287,383)	1,278,760		1,204,836	752,322	601,537	377,396	1,184,229	535,664	2,990,602	1,665,382

Loss of Fringe Benefits

Exhibit B

Pre-Trial													
Year Ending	Age	Pres. Value Year	Discount Rate	Pre-Injury				Post-Injury				Fringe Benefit Loss	Present Value
				Would Have Earned	Pct.	Year Fractions	Value	Will Earn	Pct.	Year Fractions	Value		
12/31/2021	25	0.0	0.00%	37,500	25.0%	0.25	2,344	0	0.0%	0.25	0	2,344	2,344
12/31/2022	26	0.0	0.00%	38,625	25.0%	1.00	9,656	0	0.0%	1.00	0	9,656	9,656
12/31/2023	27	0.0	0.00%	39,784	25.0%	1.00	9,946	0	0.0%	1.00	0	9,946	9,946
01/31/2024	28	0.0	0.00%	39,784	25.0%	0.08	796	0	0.0%	0.08	0	796	796
Total Pre-Trial				155,693			22,742	0			0	22,742	22,742

Post-Trial													
01/31/2025	28	0.5	2.96%	45,910	25.0%	1.00	11,478	0	0.0%	1.00	0	11,478	11,311
01/31/2026	29	1.5	2.96%	47,287	25.0%	1.00	11,822	0	0.0%	1.00	0	11,822	11,316
01/31/2027	30	2.5	2.96%	48,706	25.0%	1.00	12,177	0	0.0%	1.00	0	12,177	11,320
01/31/2028	31	3.5	2.96%	50,167	25.0%	1.00	12,542	0	0.0%	1.00	0	12,542	11,324
01/31/2029	32	4.5	2.96%	51,672	25.0%	1.00	12,918	0	0.0%	1.00	0	12,918	11,329
01/31/2030	33	5.5	2.96%	53,222	25.0%	1.00	13,306	0	0.0%	1.00	0	13,306	11,333
01/31/2031	34	6.5	2.96%	54,819	25.0%	1.00	13,705	0	0.0%	1.00	0	13,705	11,338
01/31/2032	35	7.5	2.96%	56,464	25.0%	1.00	14,116	0	0.0%	1.00	0	14,116	11,342
01/31/2033	36	8.5	2.96%	58,158	25.0%	1.00	14,540	0	0.0%	1.00	0	14,540	11,347
01/31/2034	37	9.5	2.96%	59,903	25.0%	1.00	14,976	0	0.0%	1.00	0	14,976	11,351
01/31/2035	38	10.5	2.96%	61,700	25.0%	1.00	15,425	0	0.0%	1.00	0	15,425	11,355
01/31/2036	39	11.5	2.96%	63,551	25.0%	1.00	15,888	0	0.0%	1.00	0	15,888	11,360
01/31/2037	40	12.5	2.96%	65,458	25.0%	1.00	16,365	0	0.0%	1.00	0	16,365	11,364
01/31/2038	41	13.5	2.96%	67,422	25.0%	1.00	16,856	0	0.0%	1.00	0	16,856	11,369
01/31/2039	42	14.5	2.96%	69,445	25.0%	1.00	17,361	0	0.0%	1.00	0	17,361	11,373
01/31/2040	43	15.5	2.96%	71,528	25.0%	1.00	17,882	0	0.0%	1.00	0	17,882	11,378
01/31/2041	44	16.5	2.96%	73,674	25.0%	1.00	18,419	0	0.0%	1.00	0	18,419	11,382
01/31/2042	45	17.5	2.96%	75,884	25.0%	1.00	18,971	0	0.0%	1.00	0	18,971	11,387
01/31/2043	46	18.5	2.96%	78,161	25.0%	1.00	19,540	0	0.0%	1.00	0	19,540	11,391
01/31/2044	47	19.5	2.96%	80,506	25.0%	1.00	20,127	0	0.0%	1.00	0	20,127	11,395
01/31/2045	48	20.5	2.96%	82,921	25.0%	1.00	20,730	0	0.0%	1.00	0	20,730	11,400
01/31/2046	49	21.5	2.96%	85,409	25.0%	1.00	21,352	0	0.0%	1.00	0	21,352	11,404
01/31/2047	50	22.5	2.96%	87,971	25.0%	1.00	21,993	0	0.0%	1.00	0	21,993	11,409
01/31/2048	51	23.5	2.96%	90,610	25.0%	1.00	22,653	0	0.0%	1.00	0	22,653	11,413
01/31/2049	52	24.5	2.96%	93,328	25.0%	1.00	23,332	0	0.0%	1.00	0	23,332	11,418
01/31/2050	53	25.5	2.96%	96,128	25.0%	1.00	24,032	0	0.0%	1.00	0	24,032	11,422
01/31/2051	54	26.5	2.96%	99,012	25.0%	1.00	24,753	0	0.0%	1.00	0	24,753	11,426
01/31/2052	55	27.5	2.96%	101,982	25.0%	1.00	25,496	0	0.0%	1.00	0	25,496	11,431
01/31/2053	56	28.5	2.96%	105,041	25.0%	1.00	26,260	0	0.0%	1.00	0	26,260	11,435
01/31/2054	57	29.5	2.96%	108,192	25.0%	1.00	27,048	0	0.0%	1.00	0	27,048	11,440
01/31/2055	58	30.5	2.96%	111,438	25.0%	1.00	27,860	0	0.0%	1.00	0	27,860	11,444
01/31/2056	59	31.5	2.96%	114,781	25.0%	0.17	4,878	0	0.0%	0.17	0	4,878	1,946
Total Post-Trial				2,410,450			578,795	0			0	578,795	354,654
Grand Totals				2,566,143			601,537	0			0	601,537	377,396

Source

Bureau of Labor Statistics, "Employer Costs for Employee Compensation", National Compensation Survey, Table 4. Employer Costs for Employee Compensation for private industry workers by occupational and industry group

September 2023

Series: Installation, maintenance, and repair occupations

Benefits Selected	Pre-Injury	Post-Injury
Insurance	11.8%	0.0%
Retirement and savings	7.3%	0.0%
Legally required *	11.9%	0.0%
Percentage of Wages	31.0%	0.0%
Use	25.0%	

All Benefits

	Cost	% of Wages
Wages and Salaries	\$29.52	
Benefits	\$13.55	45.9%
	\$43.07	
Paid leave	\$3.07	10.4%
Supplemental pay	\$1.36	4.6%
Insurance	\$3.47	11.8%
Retirement and savings	\$2.16	7.3%
Legally required *	\$3.50	11.9%
	\$13.56	46.0%

* Social Security, Medicare, Worker's Compensation Insurance & Unemployment Insurance

Lost Production of Household Services

Exhibit C

Pre-Trial					Pre-Injury					Post-Injury							
Year Ending	Age	Earnings Growth	Discount Rate	Pres. Value Year	DVD Table	Hours Weekly	Pay Rate Current Year	Pay Rate Reduced For Area	Total Services	Hours Weekly	Pay Rate Current Year	Pay Rate Reduced For Area	Total Services	Lost Services	Year Fractions	Net Lost Services	Present Value
12/31/2021	25	3.70%	0.0%	0.0	5	11.27	17.50	14.08	8,253	0.00	0.00	0.00	0	8,253	0.25	2,063	2,063
12/31/2022	26	3.70%	0.0%	0.0	5	11.27	18.15	14.61	8,560	0.00	0.00	0.00	0	8,560	1.00	8,560	8,560
12/31/2023	27	3.70%	0.0%	0.0	5	11.27	18.82	15.15	8,876	0.00	0.00	0.00	0	8,876	1.00	8,876	8,876
01/31/2024	28	0.00%	0.0%	0.0	5	11.27	18.82	15.15	8,876	0.00	0.00	0.00	0	8,876	0.08	710	710
Total Pre-Trial									34,565				0	34,565		20,209	20,209

Post-Trial					Pre-Injury					Post-Injury							
01/31/2025	28	3.70%	2.96%	0.5	0	11.27	19.52	15.71	9,207	0.00	0.00	0.00	0	9,207	1.00	9,207	9,074
01/31/2026	29	3.70%	2.96%	1.5	0	11.27	20.24	16.29	9,546	0.00	0.00	0.00	0	9,546	1.00	9,546	9,137
01/31/2027	30	3.70%	2.96%	2.5	0	11.27	20.99	16.89	9,900	0.00	0.00	0.00	0	9,900	1.00	9,900	9,204
01/31/2028	31	3.70%	2.96%	3.5	0	11.27	21.77	17.52	10,268	0.00	0.00	0.00	0	10,268	1.00	10,268	9,271
01/31/2029	32	3.70%	2.96%	4.5	0	11.27	22.58	18.17	10,650	0.00	0.00	0.00	0	10,650	1.00	10,650	9,340
01/31/2030	33	3.70%	2.96%	5.5	0	11.27	23.42	18.85	11,046	0.00	0.00	0.00	0	11,046	1.00	11,046	9,409
01/31/2031	34	3.70%	2.96%	6.5	0	11.27	24.29	19.55	11,456	0.00	0.00	0.00	0	11,456	1.00	11,456	9,477
01/31/2032	35	3.70%	2.96%	7.5	0	11.27	25.19	20.27	11,881	0.00	0.00	0.00	0	11,881	1.00	11,881	9,546
01/31/2033	36	3.70%	2.96%	8.5	0	11.27	26.12	21.02	12,319	0.00	0.00	0.00	0	12,319	1.00	12,319	9,614
01/31/2034	37	3.70%	2.96%	9.5	0	11.27	27.09	21.80	12,777	0.00	0.00	0.00	0	12,777	1.00	12,777	9,685
01/31/2035	38	3.70%	2.96%	10.5	0	11.27	28.09	22.61	13,249	0.00	0.00	0.00	0	13,249	1.00	13,249	9,754
01/31/2036	39	3.70%	2.96%	11.5	0	11.27	29.13	23.44	13,739	0.00	0.00	0.00	0	13,739	1.00	13,739	9,824
01/31/2037	40	3.70%	2.96%	12.5	0	11.27	30.21	24.31	14,248	0.00	0.00	0.00	0	14,248	1.00	14,248	9,895
01/31/2038	41	3.70%	2.96%	13.5	0	11.27	31.33	25.21	14,777	0.00	0.00	0.00	0	14,777	1.00	14,777	9,967
01/31/2039	42	3.70%	2.96%	14.5	0	11.27	32.49	26.15	15,324	0.00	0.00	0.00	0	15,324	1.00	15,324	10,039
01/31/2040	43	3.70%	2.96%	15.5	0	11.27	33.69	27.11	15,890	0.00	0.00	0.00	0	15,890	1.00	15,890	10,110
01/31/2041	44	3.70%	2.96%	16.5	0	11.27	34.94	28.12	16,479	0.00	0.00	0.00	0	16,479	1.00	16,479	10,184
01/31/2042	45	3.70%	2.96%	17.5	0	11.27	36.23	29.16	17,088	0.00	0.00	0.00	0	17,088	1.00	17,088	10,256
01/31/2043	46	3.70%	2.96%	18.5	0	11.27	37.57	30.24	17,720	0.00	0.00	0.00	0	17,720	1.00	17,720	10,330
01/31/2044	47	3.70%	2.96%	19.5	0	11.27	38.96	31.36	18,375	0.00	0.00	0.00	0	18,375	1.00	18,375	10,404
01/31/2045	48	3.70%	2.96%	20.5	0	11.27	40.40	32.51	19,054	0.00	0.00	0.00	0	19,054	1.00	19,054	10,478
01/31/2046	49	3.70%	2.96%	21.5	0	11.27	41.90	33.72	19,762	0.00	0.00	0.00	0	19,762	1.00	19,762	10,555
01/31/2047	50	3.70%	2.96%	22.5	0	11.27	43.45	34.97	20,493	0.00	0.00	0.00	0	20,493	1.00	20,493	10,631
01/31/2048	51	3.70%	2.96%	23.5	0	11.27	45.06	36.26	21,252	0.00	0.00	0.00	0	21,252	1.00	21,252	10,708
01/31/2049	52	3.70%	2.96%	24.5	0	11.27	46.73	37.61	22,040	0.00	0.00	0.00	0	22,040	1.00	22,040	10,785
01/31/2050	53	3.70%	2.96%	25.5	0	11.27	48.46	39.00	22,856	0.00	0.00	0.00	0	22,856	1.00	22,856	10,863
01/31/2051	54	3.70%	2.96%	26.5	0	11.27	50.25	40.44	23,700	0.00	0.00	0.00	0	23,700	1.00	23,700	10,940
01/31/2052	55	3.70%	2.96%	27.5	0	11.27	52.11	41.94	24,577	0.00	0.00	0.00	0	24,577	1.00	24,577	11,019
01/31/2053	56	3.70%	2.96%	28.5	0	11.27	54.04	43.49	25,488	0.00	0.00	0.00	0	25,488	1.00	25,488	11,099
01/31/2054	57	3.70%	2.96%	29.5	0	11.27	56.04	45.10	26,431	0.00	0.00	0.00	0	26,431	1.00	26,431	11,179
01/31/2055	58	3.70%	2.96%	30.5	0	11.27	58.12	46.77	27,412	0.00	0.00	0.00	0	27,412	1.00	27,412	11,260
01/31/2056	59	3.70%	2.96%	31.5	0	11.27	60.27	48.51	28,426	0.00	0.00	0.00	0	28,426	1.00	28,426	11,341
01/31/2057	60	3.70%	2.96%	32.5	0	11.27	62.50	50.30	29,478	0.00	0.00	0.00	0	29,478	1.00	29,478	11,423
01/31/2058	61	3.70%	2.96%	33.5	0	11.27	64.81	52.16	30,567	0.00	0.00	0.00	0	30,567	1.00	30,567	11,504
01/31/2059	62	3.70%	2.96%	34.5	0	11.27	67.21	54.09	31,699	0.00	0.00	0.00	0	31,699	1.00	31,699	11,587
01/31/2060	63	3.70%	2.96%	35.5	0	11.27	69.70	56.09	32,874	0.00	0.00	0.00	0	32,874	1.00	32,874	11,671
01/31/2061	64	3.70%	2.96%	36.5	0	11.27	72.28	58.17	34,091	0.00	0.00	0.00	0	34,091	1.00	34,091	11,755
01/31/2062	65	3.70%	2.96%	37.5	0	11.27	74.96	60.33	35,355	0.00	0.00	0.00	0	35,355	1.00	35,355	11,841

01/31/2063	66	3.70%	2.96%	38.5	0	11.27	77.74	62.57	36,666	0.00	0.00	0.00	0	36,666	1.00	36,666	11,927
01/31/2064	67	3.70%	2.96%	39.5	0	11.27	80.62	64.88	38,024	0.00	0.00	0.00	0	38,024	1.00	38,024	12,013
01/31/2065	68	3.70%	2.96%	40.5	0	11.27	83.61	67.29	39,434	0.00	0.00	0.00	0	39,434	1.00	39,434	12,100
01/31/2066	69	3.70%	2.96%	41.5	0	11.27	86.71	69.78	40,896	0.00	0.00	0.00	0	40,896	1.00	40,896	12,188
01/31/2067	70	3.70%	2.96%	42.5	0	11.27	89.92	72.37	42,410	0.00	0.00	0.00	0	42,410	1.00	42,410	12,276
01/31/2068	71	3.70%	2.96%	43.5	0	11.27	93.25	75.05	43,981	0.00	0.00	0.00	0	43,981	1.00	43,981	12,365
01/31/2069	72	3.70%	2.96%	44.5	0	11.27	96.70	77.82	45,608	0.00	0.00	0.00	0	45,608	1.00	45,608	12,453
01/31/2070	73	3.70%	2.96%	45.5	0	11.27	100.28	80.71	47,297	0.00	0.00	0.00	0	47,297	1.00	47,297	12,543
01/31/2071	74	3.70%	2.96%	46.5	0	11.27	103.99	83.69	49,046	0.00	0.00	0.00	0	49,046	1.00	49,046	12,633
11/07/2071	75	3.70%	2.96%	47.5	0	11.27	107.84	86.79	50,862	0.00	0.00	0.00	0	50,862	0.77	39,164	9,798
Total Post-Trial									1,175,718			0	1,175,718		1,164,020	515,455	
Grand Totals									1,210,283			0	1,210,283		1,184,229	535,664	

Source

Expectancy Data, *The Dollar Value of a Day: 2020 Dollar Valuation*. Shawnee Mission, Kansas, 2021.

Explained

Household Services are those uncompensated activities that maintain and enhance the lives of those in the household that can no longer be performed due to permanent injury or death of the subject. The loss, even though not directly compensated like regular employment, has value to the family nonetheless since the tasks will:

- a) Not be done at all or not as often
- b) Be done by someone else in the household (at the expense of other activities the "someone else" might have been doing)
- c) Require outside assistance that may have to be compensated at market rates

<u>Pre-Injury Time Use Category</u>	<u>Able?</u>	<u>Hours</u>	<u>Pav Rate</u>	<u>Weighted Average</u>	<u>Indexed to 2021 (1)</u>
Inside Housework	Yes	1.97	\$15.15	\$2.65	\$2.75
Food Cooking & Clean-up	Yes	2.00	\$14.97	\$2.66	\$2.76
Pets, Home & Vehicles	Yes	2.75	\$17.73	\$4.33	\$4.49
Household Management	Yes	0.76	\$21.61	\$1.46	\$1.51
Shopping	Yes	1.79	\$15.50	\$2.46	\$2.56
Obtaining Services	Yes	0.08	\$18.81	\$0.13	\$0.14
Travel for Household Activity	Yes	1.92	\$18.63	\$3.17	\$3.29
		<u>11.27</u>		<u>\$16.86</u>	<u>\$17.50</u>

<u>Post-Injury Time Use Category</u>	<u>Able?</u>	<u>Hours</u>	<u>Pav Rate</u>	<u>Weighted Average</u>	<u>Indexed to 2021 (1)</u>
Inside Housework	No	0.00	\$0.00	\$0.00	\$0.00
Food Cooking & Clean-up	No	0.00	\$0.00	\$0.00	\$0.00
Pets, Home & Vehicles	No	0.00	\$0.00	\$0.00	\$0.00
Household Management	No	0.00	\$0.00	\$0.00	\$0.00
Shopping	No	0.00	\$0.00	\$0.00	\$0.00
Obtaining Services	No	0.00	\$0.00	\$0.00	\$0.00
Travel for Household Activity	No	0.00	\$0.00	\$0.00	\$0.00
		<u>0.00</u>		<u>\$0.00</u>	<u>\$0.00</u>

1) Indexed to 2021 using the Earnings Growth Rate

DVD Table

Table 262 Single men, Employed full-time, All ages, No minor children in home
Mr. Male did have one minor child born 04.10.2018; however, none are assumed for this calculation which lowers the household hours and lowers the damage number.

Earnings Growth

By analyzing the increase in rates per hour from the 2011 tables to the 2020 tables in *The Dollar Value of a Day*

	<u>2016</u>	<u>2018</u>	<u>2020</u>	<u>% Incr.</u>
<u>Table 368. Men, Ages 18 & Over</u>				
Household Production	\$14.67	\$15.56	\$17.03	3.80%
<u>Table 378. Women, Ages 18 & Over</u>				
Household Production	\$14.05	\$14.88	\$16.25	3.70%

National to Area Wage Adjustment per DVD

West Tennessee nonmetropolitan area 80.48%

Personal Maintenance

Exhibit D

Pre-Trial				
Year Ending	Net Earnings Growth	Plaintiff Would Have Earned	Personal Maintenance Income%*	Personal Maintenance
12/31/2021	0.0%	37,500	60.1%	(22,529)
12/31/2022	3.0%	38,625	60.1%	(23,205)
12/31/2023	3.0%	39,784	60.1%	(23,901)
01/31/2024	0.0%	39,784	60.1%	(23,901)
Total Pre-Trial		155,693		(93,536)

Post-Trial				
Year Ending	Net Earnings Growth	Plaintiff Would Have Earned	Personal Maintenance Income%*	Personal Maintenance
01/31/2025	3.0%	45,910	49.5%	(22,738)
01/31/2026	3.0%	47,287	49.5%	(23,420)
01/31/2027	3.0%	48,706	49.5%	(24,123)
01/31/2028	3.0%	50,167	49.5%	(24,847)
01/31/2029	3.0%	51,672	49.5%	(25,592)
01/31/2030	3.0%	53,222	49.5%	(26,360)
01/31/2031	3.0%	54,819	49.5%	(27,151)
01/31/2032	3.0%	56,464	49.5%	(27,965)
01/31/2033	3.0%	58,158	49.5%	(28,804)
01/31/2034	3.0%	59,903	49.5%	(29,669)
01/31/2035	3.0%	61,700	49.5%	(30,559)
01/31/2036	3.0%	63,551	49.5%	(31,476)
01/31/2037	3.0%	65,458	49.5%	(32,420)
01/31/2038	3.0%	67,422	49.5%	(33,393)
01/31/2039	3.0%	69,445	49.5%	(34,395)
01/31/2040	3.0%	71,528	49.5%	(35,426)
01/31/2041	3.0%	73,674	49.5%	(36,489)
01/31/2042	3.0%	75,884	49.5%	(37,584)
01/31/2043	3.0%	78,161	49.5%	(38,712)
01/31/2044	3.0%	80,506	49.5%	(39,873)
01/31/2045	3.0%	82,921	49.5%	(41,069)
01/31/2046	3.0%	85,409	49.5%	(42,301)
01/31/2047	3.0%	87,971	49.5%	(43,570)
01/31/2048	3.0%	90,610	49.5%	(44,877)
01/31/2049	3.0%	93,328	49.5%	(46,223)
01/31/2050	3.0%	96,128	49.5%	(47,610)
01/31/2051	3.0%	99,012	49.5%	(49,039)
01/31/2052	3.0%	101,982	49.5%	(50,510)
01/31/2053	3.0%	105,041	49.5%	(52,025)
01/31/2054	3.0%	108,192	49.5%	(53,585)
01/31/2055	3.0%	111,438	49.5%	(55,193)
01/31/2056	3.0%	114,781	49.5%	(56,849)
Total Post-Trial		2,410,450		(1,193,847)
Grand Totals		2,566,143		(1,287,383)

Source

BLS Table 3404. Consumer units of one person by income before taxes: Average annual expenditures and characteristics, Consumer Expenditures Survey, 2020-21

Explained

"The "deceased's probable living expenses had the deceased lived. These living expenses are those that under the standard of living followed by the deceased would have been reasonably necessary for him to incur in order to keep himself in such a condition of health and well being that he could maintain his capacity to earn money." *Wallace v. Couch*, 642 S.W.2d 141 (Tenn.Supt.Ct. 1982)

From the Consumer Expenditures Survey, 2020-21:

Income	\$15,000 to \$29,999	\$30,000 to \$39,999	\$40,000 to \$49,999	\$50,000 to \$69,999	\$70,000 and \$99,999	\$100,000 and More
Avg Income Bef Taxes (A)	\$21,440	\$34,537	\$44,381	\$58,267	\$81,877	\$162,458
Food at Home	\$2,682	\$3,053	\$2,757	\$3,072	\$3,488	\$4,100
Housing (1)	9,480	11,328	11,715	12,509	13,374	19,159
Apparel and Services (2)	372	436	413	567	674	1,857
Transportation (3)	3,257	4,379	5,605	5,529	5,737	7,260
Health Care (4)	1,190	1,132	1,043	1,002	1,304	1,982
Personal Care products/services	361	421	448	533	643	771
Total Expenses (B)	\$17,342	\$20,749	\$21,981	\$23,212	\$25,220	\$35,129
Personal Maintenance (B÷A)	80.9%	60.1%	49.5%	39.8%	30.8%	21.6%

- 1) Assumes a Rented Dwelling; less Owned Dwelling and Other Lodging
- 2) Less Women expenses
- 3) Less Vehicle Purchases-Cars & Trucks New and Public and Other Transportation
- 4) Less Health Insurance

* Frozen % at 49.5% due to inflationary factors on the earnings

Food at Home

\$2,682 \$3,053 \$2,757 \$3,072 \$3,488 \$4,100

Housing

\$13,126 \$14,982 \$16,413 \$17,882 \$20,604 \$32,164

Owned Dwellings

\$3,421 \$3,428 \$4,354 \$4,966 \$6,637 \$11,334

Other Lodging

\$225 \$226 \$344 \$407 \$593 \$1,671

Apparel and Services

\$674 \$820 \$729 \$1,050 \$1,105 \$2,704

Men

\$146 \$110 \$147 \$187 \$330 \$693

Women

\$302 \$384 \$316 \$483 \$431 \$847

Transportation

\$3,935 \$4,821 \$6,459 \$7,511 \$7,837 \$10,917

Vehicle Purchases-Cars & Trucks New

\$570 \$249 \$689 \$1,669 \$1,743 \$2,826

Public and Other Transportation

\$108 \$193 \$165 \$313 \$357 \$831

Healthcare

\$3,664 \$3,243 \$3,297 \$3,360 \$3,827 \$4,933

Health Insurance

\$2,474 \$2,111 \$2,254 \$2,358 \$2,523 \$2,951

Personal Care products/services

\$361 \$421 \$448 \$533 \$643 \$771

Earning Capacity
Exhibit E

Actual Earnings

Employer	Reporting Forms	2021	2020	2019
Employer 1	W-2	\$16,724		\$22,888
Employer 2	W-2	\$9,600		
Unknown Employers	Form 1040, Line 7		\$37,500	
Employer 3	W-2			\$256
Employer 4	W-2			\$3,704
		<u>\$26,324</u>	<u>\$37,500</u>	<u>\$26,848</u>

Earning Capacity

Occupational Employment and Wage Statistics (OEWS) Survey

Bureau of Labor Statistics, Department of Labor

website: www.bls.gov/oes

May 2022 OEWS Estimates

Area: Jackson, TN MSA
Occupational Code: 49-3023
Occupational Title: Automotive Service Technicians and Mechanics
Annual Mean Earnings: **\$45,910**
Hourly Mean Earnings: \$22.07

Mr. Adult has lost the opportunity to reach his earning capacity; therefore, the Annual Mean Earnings is assumed in 2025.

References

Exhibit F

Statistical Worklife Expectancy

"The Markov Process Model of Labor Force Activity 2012-17: Extended Tables of Central Tendency, Shape, Percentile Points, and Bootstrap Standard Errors", Gary Skoog, James Cieccka & Kurt Krueger, *Journal of Forensic Economics* 28(1-2), 2019, pp. 15-108, Table 5-Initially Active Men, High School Diploma

Statistical Life Expectancy

U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, National Vital Statistics System, *United States Life Tables, 2021, National Vital Statistics Reports, Vol. 72, No. 12, November 7, 2023*, for White, non-Hispanic males

Discount Rate

U.S. Federal Reserve Statistical Release through 11/30/23

30 Year Treasury Constant Maturities - 5 Year average 2.96%

Earnings Growth Rate

Bureau of Labor Statistics, "Employment Cost Index", National Compensation Survey, Table 5. Compensation (not seasonally adjusted): Employment Cost Index for total compensation, for private industry workers, by occupational group and industry
Sep-23

Occupational Group: All workers 4.3% Use: 3.0%

Fringe Benefits-Exhibit B

Bureau of Labor Statistics, "Employer Costs for Employee Compensation", National Compensation Survey, Table 4. Employer Costs for Employee Compensation for private industry workers by occupational and industry group
September 2023

Series: Installation, maintenance, and repair occupations

Lost Production of Household Services-Exhibit C

Expectancy Data, The Dollar Value of a Day: 2020 Dollar Valuation. Shawnee Mission, Kansas, 2021.

Personal Maintenance-Exhibit D

BLS Table 3404. Consumer units of one person by income before taxes: Average annual expenditures and characteristics, Consumer Expenditures Survey, 2020-21