

Personal Injury Economic Damages Report

Plaintiff v. Defendant

Name	Plaintiff	Life Expectancy	50.8
Sex	Female	Age at End of Life Expectancy	80.3
Race	Black	End of Life Date	4/24/2063
Birthdate	12/28/1982	End of Life Year Fraction	0.25
"Injury" Date	07/06/2012	Educational Attainment	GED
Valuation Date	08/15/2017	Worklife Expectancy	22.5
Assumed "Trial" Date	01/22/2018	Retirement Age	52.0
Age at Injury	29.5	End of Worklife Date	1/5/2035
Injury Year Fraction	0.49	End of Worklife Year Fraction	0.95
Trial Year Fraction	0.06	Discount Rate	2.55%

Damages Summary				
Present Values				
Period of Damage	Pre-Trial	Post-Trial	Total	Running Total
Income Loss	105,570	338,805	444,375	444,000
Fringe Benefits Loss	23,332	74,876	98,208	543,000
Household Production Loss	84,804	380,085	464,889	1,007,000
Future Medical Costs	0	5,924,934	5,924,934	6,932,000
Total Damages	213,706	6,718,700	6,932,406	
Rounded			6,932,000	

Based on my study and analytical review procedures, I have concluded that the economic damages suffered by the Plaintiff as a result her alleged permanent injury are \$6,932,000, within a reasonable degree of accounting and economic certainty. The damage amount consists of the present values of the lost economic income earning capacity, associated lost fringe benefits, household services and projected future medical costs.

We have performed an analysis that we believe is in conformity with the Statement on Standards for Consulting Services No. 1 (SSCS) 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).

Neither the professionals who worked on this engagement, nor the principal of FVS have any present or contemplated future interest in the parties, 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.

We relied on information contained in the revised Life Care Plan prepared by Life Care Planner, Inc. dated August 1, 2017. I reserve the right to amend the report if information or documents come to my attention in the future that may alter my opinions.



Robert Vance, CPA, ABV, CFF, CVA, CFP
Forensic & Valuation Services, PLC
P.O. Box 172271, Memphis, Tennessee 38187
August 15, 2017

Loss of Earning Capacity, Fringe Benefits, Household Services and Future Medical Costs

Exhibit A

Pre-Trial				Loss of Earning Capacity						Loss of Fringe Benefits		Lost Production of Household Services		Future Medical Costs		Total Annual Loss	
Year Ending	Pres. Value Year	Earnings Growth	Discount Rate	Could Have Earned Exhibit E	Did/Will Earn	Net Earnings	Year Fractions	Net Earnings Loss	Present Value	Benefit Loss	Present Value	Services Loss	Present Value	Medical Cost	Present Value	Total Loss	Present Value
12/31/2012	0	1.80%	0.0%	18,000	0	18,000	0.49	8,820	8,820	1,949	1,949	7,487	7,487	0	0	18,256	18,256
12/31/2013	0	2.00%	0.0%	18,324	0	18,324	1.00	18,324	18,324	4,050	4,050	15,280	15,280	0	0	37,654	37,654
12/31/2014	0	2.30%	0.0%	18,690	0	18,690	1.00	18,690	18,690	4,130	4,130	15,280	15,280	0	0	38,100	38,100
12/31/2015	0	1.90%	0.0%	19,120	0	19,120	1.00	19,120	19,120	4,226	4,226	15,280	15,280	0	0	38,626	38,626
12/31/2016	0	2.20%	0.0%	19,483	0	19,483	1.00	19,483	19,483	4,306	4,306	15,280	15,280	0	0	39,069	39,069
12/31/2017	0	2.20%	0.0%	19,912	0	19,912	1.00	19,912	19,912	4,401	4,401	15,280	15,280	0	0	39,593	39,593
01/22/2018	0	2.20%	0.0%	20,350	0	20,350	0.06	1,221	1,221	270	270	917	917	0	0	2,408	2,408
Total Pre-Trial				133,879	0	133,879		105,570	105,570	23,332	23,332	84,804	84,804	0	0	213,706	213,706

Post-Trial				Loss of Earning Capacity						Loss of Fringe Benefits		Lost Production of Household Services		Future Medical Costs		Total Annual Loss	
Year Ending	Pres. Value Year	Earnings Growth	Discount Rate	Could Have Earned Exhibit E	Did/Will Earn	Net Earnings	Year Fractions	Net Earnings Loss	Present Value	Benefit Loss	Present Value	Services Loss	Present Value	Medical Cost	Present Value	Total Loss	Present Value
01/22/2019	0.5	2.20%	2.55%	20,798	0	20,798	1.00	20,798	20,538	4,596	4,538	15,280	15,172	238,560	234,832	279,234	275,081
01/22/2020	1.5	2.20%	2.55%	21,256	0	21,256	1.00	21,256	20,468	4,698	4,524	15,280	14,959	166,607	158,918	207,841	198,869
01/22/2021	2.5	2.20%	2.55%	21,724	0	21,724	1.00	21,724	20,399	4,801	4,508	15,280	14,749	163,687	151,292	205,492	190,947
01/22/2022	3.5	2.20%	2.55%	22,202	0	22,202	1.00	22,202	20,329	4,907	4,493	15,280	14,541	165,794	148,487	208,183	187,850
01/22/2023	4.5	2.20%	2.55%	22,690	0	22,690	1.00	22,690	20,259	5,014	4,477	15,280	14,337	168,630	146,344	211,614	185,417
01/22/2024	5.5	2.20%	2.55%	23,189	0	23,189	1.00	23,189	20,190	5,125	4,462	15,280	14,135	253,164	212,894	296,758	251,681
01/22/2025	6.5	2.20%	2.55%	23,699	0	23,699	1.00	23,699	20,121	5,237	4,446	15,280	13,937	209,750	170,916	253,966	209,420
01/22/2026	7.5	2.20%	2.55%	24,220	0	24,220	1.00	24,220	20,052	5,353	4,432	12,712	11,431	177,694	140,306	219,979	176,221
01/22/2027	8.5	2.20%	2.55%	24,753	0	24,753	1.00	24,753	19,984	5,470	4,416	12,712	11,271	181,799	139,096	224,734	174,766
01/22/2028	9.5	2.20%	2.55%	25,298	0	25,298	1.00	25,298	19,916	5,591	4,401	12,712	11,112	184,105	136,492	227,706	171,922
01/22/2029	10.5	2.20%	2.55%	25,855	0	25,855	1.00	25,855	19,848	5,714	4,386	12,712	10,956	193,424	138,955	237,705	174,145
01/22/2030	11.5	2.20%	2.55%	26,424	0	26,424	1.00	26,424	19,781	5,840	4,372	12,712	10,802	193,376	134,612	238,352	169,567
01/22/2031	12.5	2.20%	2.55%	27,005	0	27,005	1.00	27,005	19,713	5,968	4,356	9,952	8,338	327,690	221,038	370,615	253,445
01/22/2032	13.5	2.20%	2.55%	27,599	0	27,599	1.00	27,599	19,645	6,099	4,341	9,952	8,221	197,344	128,988	240,994	161,195
01/22/2033	14.5	2.20%	2.55%	28,206	0	28,206	1.00	28,206	19,578	6,234	4,327	9,952	8,105	201,960	127,911	246,352	159,922
01/22/2034	15.5	2.20%	2.55%	28,827	0	28,827	1.00	28,827	19,512	6,371	4,312	9,952	7,991	211,471	129,783	256,621	161,598
01/22/2035	16.5	2.20%	2.55%	29,461	0	29,461	0.95	27,988	18,473	6,185	4,082	9,952	7,879	207,987	123,686	252,112	154,120
01/22/2036	17.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,768	214,936	123,855	224,888	131,623
01/22/2037	18.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,659	260,812	145,631	270,764	153,290
01/22/2038	19.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,551	338,676	183,244	348,628	190,795
01/22/2039	20.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,445	232,329	121,806	242,281	129,251
01/22/2040	21.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,340	227,173	115,410	237,125	122,750
01/22/2041	22.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,237	231,070	113,749	241,022	120,987
01/22/2042	23.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,135	238,965	113,989	248,917	121,124
01/22/2043	24.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	7,035	290,953	134,484	300,905	141,519
01/22/2044	25.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,936	252,549	113,113	262,501	120,049
01/22/2045	26.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,839	401,512	174,256	411,464	181,094
01/22/2046	27.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,743	252,445	106,164	262,397	112,906
01/22/2047	28.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,648	256,781	104,638	266,733	111,286
01/22/2048	29.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,554	265,758	104,939	275,710	111,493
01/22/2049	30.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,462	334,838	128,116	344,790	134,578
01/22/2050	31.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,371	270,718	100,371	280,670	106,742
01/22/2051	32.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,282	277,308	99,626	287,260	105,908
01/22/2052	33.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,193	474,235	165,091	484,187	171,285
01/22/2053	34.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,106	285,433	96,284	295,385	102,391

01/22/2054	35.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	6,021	307,166	100,403	317,118	106,423
01/22/2055	36.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,936	362,415	114,788	372,367	120,724
01/22/2056	37.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,852	300,972	92,371	310,924	98,224
01/22/2057	38.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,770	308,403	91,717	318,355	97,487
01/22/2058	39.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,689	312,007	89,912	321,959	95,601
01/22/2059	40.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,609	576,946	161,104	586,898	166,714
01/22/2060	41.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,530	329,013	89,024	338,965	94,554
01/22/2061	42.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,453	404,679	106,102	414,631	111,555
01/22/2062	43.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,376	334,714	85,037	344,666	90,413
01/22/2063	44.5	2.20%	2.55%	0	0	0	1.00	0	0	0	0	9,952	5,300	343,099	84,464	353,051	89,764
04/24/2063	45.5	2.20%	2.55%	0	0	0	0.25	0	0	0	0	2,488	1,306	86,759	20,696	89,247	22,002
Total Post-Trial				423,206	0	423,206		421,733	338,805	93,203	74,876	501,424	380,085	12,215,705	5,924,934	13,232,064	6,718,700
Grand Totals				557,085	0	557,085		527,303	444,375	116,535	98,208	586,228	464,889	12,215,705	5,924,934	13,445,770	6,932,406

**Loss of Fringe Benefits
Exhibit B**

Pre-Trial										
Year Ending	Pres. Value Year	Discount Rate	Would Have Earned	Did/Will Earn	Net Earnings	Year Fractions	Net Earnings Loss	Fringe Benefit Pct.	Fringe Benefit Loss	Present Value
12/31/2012	0	0.00%	18,000	0	18,000	0.49	8,820	22.1%	1,949	1,949
12/31/2013	0	0.00%	18,324	0	18,324	1.00	18,324	22.1%	4,050	4,050
12/31/2014	0	0.00%	18,690	0	18,690	1.00	18,690	22.1%	4,130	4,130
12/31/2015	0	0.00%	19,120	0	19,120	1.00	19,120	22.1%	4,226	4,226
12/31/2016	0	0.00%	19,483	0	19,483	1.00	19,483	22.1%	4,306	4,306
12/31/2017	0	0.00%	19,912	0	19,912	1.00	19,912	22.1%	4,401	4,401
01/22/2018	0	0.00%	20,350	0	20,350	0.06	1,221	22.1%	270	270
Total Pre-Trial			133,879	0	133,879		105,570		23,332	23,332

Post-Trial										
Year Ending	Pres. Value Year	Discount Rate	Would Have Earned	Did/Will Earn	Net Earnings	Year Fractions	Net Earnings Loss	Fringe Benefit Pct.	Fringe Benefit Loss	Present Value
01/22/2019	0.5	2.55%	20,798	0	20,798	1.00	20,798	22.1%	4,596	4,538
01/22/2020	1.5	2.55%	21,256	0	21,256	1.00	21,256	22.1%	4,698	4,524
01/22/2021	2.5	2.55%	21,724	0	21,724	1.00	21,724	22.1%	4,801	4,508
01/22/2022	3.5	2.55%	22,202	0	22,202	1.00	22,202	22.1%	4,907	4,493
01/22/2023	4.5	2.55%	22,690	0	22,690	1.00	22,690	22.1%	5,014	4,477
01/22/2024	5.5	2.55%	23,189	0	23,189	1.00	23,189	22.1%	5,125	4,462
01/22/2025	6.5	2.55%	23,699	0	23,699	1.00	23,699	22.1%	5,237	4,446
01/22/2026	7.5	2.55%	24,220	0	24,220	1.00	24,220	22.1%	5,353	4,432
01/22/2027	8.5	2.55%	24,753	0	24,753	1.00	24,753	22.1%	5,470	4,416
01/22/2028	9.5	2.55%	25,298	0	25,298	1.00	25,298	22.1%	5,591	4,401
01/22/2029	10.5	2.55%	25,855	0	25,855	1.00	25,855	22.1%	5,714	4,386
01/22/2030	11.5	2.55%	26,424	0	26,424	1.00	26,424	22.1%	5,840	4,372
01/22/2031	12.5	2.55%	27,005	0	27,005	1.00	27,005	22.1%	5,968	4,356
01/22/2032	13.5	2.55%	27,599	0	27,599	1.00	27,599	22.1%	6,099	4,341
01/22/2033	14.5	2.55%	28,206	0	28,206	1.00	28,206	22.1%	6,234	4,327
01/22/2034	15.5	2.55%	28,827	0	28,827	1.00	28,827	22.1%	6,371	4,312
01/22/2035	16.5	2.55%	29,461	0	29,461	0.95	27,988	22.1%	6,185	4,082
Total Post-Trial			423,206	0	423,206		421,733		93,203	74,876
Grand Totals			557,085	0	557,085		527,303		116,535	98,208

Reference

Bureau of Labor Statistics Economic News Release, "Employer Costs for Employee Compensation", Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private industry workers, by major occupational group and bargaining unit status

Date: March 17, 2017

Industry Group: All Workers

Summary

Health Insurance	10.9%
Legally Required *	11.2%
Percentage of Wages	<u>22.1%</u>

	Cost	% of Wages
Wages and Salaries	\$22.83	
Benefits	\$9.93	
	<u>\$32.76</u>	
Paid Leave	\$2.28	10.0%
Supplemental Pay	\$1.15	5.0%
Life Insurance	\$0.04	0.2%
Health Insurance	\$2.48	10.9%
Disability Insurance	\$0.11	0.5%
Defined Benefit Plan	\$0.58	2.5%
Defined Contribution Plan	\$0.73	3.2%
Legally Required *	\$2.56	11.2%
	<u>\$9.93</u>	<u>43.5%</u>

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

Lost Production of Household Services

Exhibit C

Pre-Trial		Pre-Injury					Post-Injury							
Year Ending	Pres. Value Year	DVD Table	Hours Weekly	Current Year Pay Rate	Pay Rate Reduced For Region	Total Services	Hours Weekly	Pay Rate	Total Services	Lost Services	Year Fractions	Net Lost Services	Present Value	
12/31/2012	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	0.49	7,487	7,487	
12/31/2013	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	15,280	
12/31/2014	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	15,280	
12/31/2015	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	15,280	
12/31/2016	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	15,280	
12/31/2017	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	15,280	
01/22/2018	0	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	0.06	917	917	
Total Pre-Trial						106,960					106,960	84,804	84,804	

Post-Trial		Pre-Injury					Post-Injury							
Year Ending	Pres. Value Year	DVD Table	Hours Weekly	Current Year Pay Rate	Pay Rate Reduced For Region	Total Services	Hours Weekly	Pay Rate	Total Services	Lost Services	Year Fractions	Net Lost Services	Present Value	
01/22/2019	1	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	15,172	
01/22/2020	2	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	14,959	
01/22/2021	3	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	14,749	
01/22/2022	4	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	14,541	
01/22/2023	5	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	14,337	
01/22/2024	6	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	14,135	
01/22/2025	7	156	23.99	13.04	12.25	15,280	0.0	12.25	0	15,280	1.00	15,280	13,937	
01/22/2026	8	157	19.64	13.26	12.45	12,712	0.0	12.45	0	12,712	1.00	12,712	11,431	
01/22/2027	9	157	19.64	13.26	12.45	12,712	0.0	12.45	0	12,712	1.00	12,712	11,271	
01/22/2028	10	157	19.64	13.26	12.45	12,712	0.0	12.45	0	12,712	1.00	12,712	11,112	
01/22/2029	11	157	19.64	13.26	12.45	12,712	0.0	12.45	0	12,712	1.00	12,712	10,956	
01/22/2030	12	157	19.64	13.26	12.45	12,712	0.0	12.45	0	12,712	1.00	12,712	10,802	
01/22/2031	13	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	8,338	
01/22/2032	14	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	8,221	
01/22/2033	15	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	8,105	
01/22/2034	16	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,991	
01/22/2035	17	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,879	
01/22/2036	18	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,768	
01/22/2037	19	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,659	
01/22/2038	20	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,551	
01/22/2039	21	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,445	
01/22/2040	22	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,340	
01/22/2041	23	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,237	
01/22/2042	24	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,135	
01/22/2043	25	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	7,035	
01/22/2044	26	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,936	
01/22/2045	27	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,839	
01/22/2046	28	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,743	
01/22/2047	29	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,648	
01/22/2048	30	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,554	
01/22/2049	31	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,462	
01/22/2050	32	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,371	
01/22/2051	33	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,282	
01/22/2052	34	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,193	
01/22/2053	35	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,106	
01/22/2054	36	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	6,021	
01/22/2055	37	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,936	
01/22/2056	38	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,852	
01/22/2057	39	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,770	

01/22/2058	40	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,689
01/22/2059	41	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,609
01/22/2060	42	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,530
01/22/2061	43	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,453
01/22/2062	44	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,376
01/22/2063	45	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	1.00	9,952	5,300
04/24/2063	46	158	15.12	13.48	12.66	9,952	0.0	12.66	0	9,952	0.25	2,488	1,306
Total Post-Trial						508,888			0	508,888		501,424	380,085
Grand Totals						615,848			0	615,848		586,228	464,889

Reference

Expectancy Data, *The Dollar Value of a Day: 2014 Dollar Valuation*. Shawnee Mission, Kansas, 2015.

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

Pre-Injury Work Categories

Inside Housework
 Food Cooking & Clean-up
 Pets, Home & Vehicles
 Household Management
 Shopping
 Obtaining Services
 Travel for Household Activity

Post-Injury Work Categories

n/a
 n/a
 n/a
 n/a
 n/a
 n/a
 n/a

Discount Rate	2.55%
Earnings Growth (See below)	1.12%
Net Used for Present Value	1.43%
Pay Rate Adjustment for Region/City	93.9%
Region: Memphis, TN-MS-AR	

Earnings Growth

By analyzing the increase in rates per hour from the 2011 tables to the 2014 tables in *The Dollar Value of a Day*;

Using Table 156 - Single females, that work full-time, youngest child under age 13:

	<u>2011</u>	<u>2014</u>	<u>% Incr.</u>
Household Production	\$12.75	\$13.18	1.12%

DVD Table - Using a combination of Household Production & Household Children

	<u>Hours</u>	<u>Rate</u>
156 - Single females, that work full-time, youngest child under age 13	16.14+7.85	(13.18*0.67)+(12.77*0.33)
157 - Single females, that work full-time, youngest child ages 13-17	17.52+2.12	(13.31*0.9)+(12.77*0.1)
158 - Single females, that work full-time, no children under age 18	15.12	13.48

39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59
Home Health Aide/Certified Nurse's Asst/ Personal Care Attendant	Blank	Physiatrist Outpatient Visit(s)	Family Medicine Outpatient Visit(s)	Orthopedist Outpatient Visit(s)	Urology Outpatient Visit(s)	Neurology Outpatient Visit(s)	Pain Management Services	Podiatry Outpatient Visit(s)	Psychiatrist Outpatient Visit(s)	Wound Care Specialist	Metabolic Chemistry Level	Lipids	Urinalysis and Culture	Urodynamics and Renal Ultrasound	X-Ray, CT Scan, MRI	Allowance for Travel Expenses	Additional Cost of Van or Appropriate Vehicle	Van Modifications - To include Power Lift and Tie Downs	Maintenance - Van Modifications	Home Modifications for Accessibility to include Roll- in Shower
24 hrs per day, 7 days per week; 365 days 2018-2062		Research being conducted	3 visits per year above normally scheduled	Research being conducted	Research being conducted	Research being conducted	Research being conducted	Every 6 weeks, or 9 per year	Research being conducted	Research being conducted	Every 6 month above normally schedule through lifetime	An additional test above normally scheduled through lifetime	As needed as symptoms present	Research being conducted	Research being conducted		1 per 6 years	1 per 6 years	Yearly and as needed	
16.00	0.00	0.00	57.00	0.00	0.00	0.00	0.00	80.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	18,000.00	200.00	0.00
18.00	0.00	0.00	77.00	0.00	0.00	0.00	0.00	156.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	26,000.00	200.00	0.00
17.00	0.00	0.00	67.00	0.00	0.00	0.00	0.00	118.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	22,000.00	200.00	0.00
36			35				35	35			35	35	35			35	35	35	36	35
0.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	22,000.00	0.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	22,000.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	22,000.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	22,000.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,500.00	22,000.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
148,920.00	0.00	0.00	201.00	0.00	0.00	0.00	0.00	1,062.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00	0.00
6,701,400.00	0.00	0.00	9,246.00	0.00	0.00	0.00	0.00	48,852.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	68,000.00	176,000.00	9,000.00	0.00

60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79
Home Modifications for Accessibility to include Roll-in Shower	Additional Items and Services TBD by PT and OT	Inpatient Rehabilitation	Weight Loss Program	Implant for Baclofen Pump	Replace Baclofen Pump	Anxiety	Chronic Pain	Cognitive Problems Due to Brain Injury	Depression	Paralysis	Risk for Contractures	Risk for Decubitus Ulcer	Risk for Falls Resulting in Orthopedic Fractures	Risk for Orthopedic Problems	Risk for Osteoporosis	Risk for Pneumonia or Respiratory Complications	Risk for Seizures	Risk for Urinary Tract Infections	Spasticity
An allowance for one more time over her lifetime may be required		18 per year for 1 year only	Research being conducted	Accomplished	Every 7 years														
0.00	0.00	2,700.00	0.00	0.00	60,962.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	2,800.00	0.00	0.00	60,962.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	2,750.00	0.00	0.00	60,962.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		35		35	40														
0.00	0.00	49,500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	60,962.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	60,962.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0.00	0.00	49,500.00	0.00	0.00	365,772.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

References

Exhibit E

Worklife Expectancy

"The Markov Process Model of Labor Force Activity: Extended Tables of Central Tendency, Shape, Percentile Points, and Bootstrap Standard Errors", Gary Skoog, James Ciecka & Kurt Krueger, *Journal of Forensic Economics*, 22(2) 2011, pp. 165-229, Table 6-Initially Active Women with GED, No Diploma

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, 2013, National Vital Statistics Reports, Vol. 66, No. 3, April 11, 2017*; for black females

Future Earning Capacity

No tax returns or W-2 forms are available to review; therefore we relied upon the Vocational Assessment prepared by Voc Assessment, Inc. dated 5/4/17. Per the report, Plaintiff worked 8-10 hours per day in numerous jobs for many years pre-injury with wages ranging from minimum wage to \$10 per hour. The last job Plaintiff held at Frames, Inc. paid her \$8 to \$9 per hour. Therefore, we are assuming a full-time, 2,000 hour work year paying \$9 per hour as the earning capacity with no mitigating wages.

Figure below was confirmed by employment records received 6/25/2017.

$$2,000 \times \$9.00 = \underline{\underline{\$18,000}}$$

Earnings Growth Rate

Bureau of Labor Statistics, Employment Cost Index Historical Listing-Vol. III, Table 5, Compensation (Not Seasonally Adjusted) Employment Cost Index for Total Compensation, For Private Industry Workers, by Occupational Group and Industry As of April 2017

Occupational Group: All workers

Used actual 2012-2016 for past growth; then 2016 for future

Fringe Benefits

Bureau of Labor Statistics Economic News Release, "Employer Costs for Employee Compensation", Table 5. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private industry workers, by major occupational group and bargaining unit status

Date: March 17, 2017

Industry Group: All Workers

Discount Rate

U.S. Federal Reserve Statistical Release August 10, 2017

Treasury Constant Maturities - 20 Year 2.55%