

**SAMPLE
WRONGFUL DEATH
ECONOMIC DAMAGES REPORT**

Of

Mary Jones

In the case:

Elizabeth Jones, as Administratrix of the Estate of
Mary Jones, Deceased

v.

Hospital Defendant
Cause No. 2005-ABCD

Prepared By:

Robert Vance, CPA, CVA, CFP
Valuation / Litigation Consultants, PLC
Memphis, Tennessee
April 30, 2006

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ROBERT VANCE, CPA, CVA, CFP

MEMBER: AICPA, TSCPA, NACVA

Mr. Plaintiff's Attorney, Esq.
The Big Law Firm
1234 Front Street
Memphis, Tennessee 38103

RE: Jones v. Hospital Defendant

I have prepared and enclosed my Wrongful Death Economic Damages Report, dated April 30, 2006 of Mary Jones (hereinafter "Mary") in the case referenced above. The purpose of the report is to produce an analysis of the economic damages sustained by Mary's family as a result of her death on January 01, 2004. The damages are composed of a Loss of Earnings that would have been earned from the jobs or occupations had she been able to work, the Loss of Fringe Benefits that are part of the jobs or occupational income streams and a Loss of Household Services that Mary would have performed had premature death not occurred.

My report is based on written and verbal information obtained through normal discovery, independent research, interviews with counsel and other third parties and my professional experience and judgment. Users of this report should be aware that an economic damages analysis is an imprecise science, with some values being a question of fact, and reasonable people can differ in their estimates. I have, however, performed conceptually sound and commonly accepted methods in determining the estimate of the economic damages included in this report. The analysis is based on future earning potential and estimates of future economic conditions, therefore, the actual earnings that might have occurred or the economic conditions that will occur in the future may vary from the assumptions used in this analysis.

I, by reason of performing this analysis and preparing this report, am not to be required to give expert testimony nor to be in attendance in court or any government hearing with reference to the matters contained herein, unless prior arrangements have been made regarding such additional engagement. The fees for this engagement are based upon my normal hourly billing rate of \$XXX per hour and are in no way contingent upon the results of my findings. I have no responsibility to update this report for events and circumstances occurring after the date of its issuance, however I reserve the right to amend the report if information or documents come to my attention in the future that may alter my opinion.

Based on my study and analytical review procedures, I have concluded that, in my opinion, a reasonable estimate of the present value, lump-sum equivalent of economic damages suffered by Mary Jones as a result of her wrongful death is \$740,000.

Robert Vance, CPA, CVA, CFP
Memphis, Tennessee
April 30, 2006

Damage Assumption and Description

The purpose of the report is to produce an analysis of the economic damages sustained by Mary's family as a result of her death on January 01, 2004. For purposes of this analysis, it is assumed that Hospital Defendant did cause the injuries to Mary while she was giving birth to Robert Jones on January 01, 2004, resulting in her death, however, the damages exist regardless of the cause of death. The economic damages sustained as a result of Mary's death are composed of:

- a **Loss of Earnings** that would have been earned from the jobs or occupations had she been able to work, consisting of:
 - **Income** from Employment, less a factor for Personal Consumption, plus
 - **Fringe Benefits** that are a part of the employment income stream; plus
- a **Loss of Household Services**, less a factor for Personal Consumption, that Mary would have performed had death not occurred.

For purposes of this analysis, June 15, 2006 is considered to be the "Trial Date".

Case Information

Trial or Settlement Date:	06/15/2006	Date Damages Began:	01/12/2004
Interest Rate:	5.0%	Discount Rate:	3.0%
(for Past Damages)		(for Future Damages)	

Present Value of Future Damages Calculated Annually
Present Value Computed Using Compound Interest

Decedent Information

Name:			
Sex:	Female	Race:	Black
Birthdate:	03/02/1982	Age at Death:	21.9
Worklife Expectancy:	28.9	Retirement Age:	50.8
Life Expectancy:	55.1	Expected Age at Death:	77.0

Economic Principles

Present Value

Damages are calculated to the “present value” so as to quantify a stream of payments into a single, lump-sum figure for settlement or award purposes. The Damages Summary on page 5 is divided into Future Values of the Past and Future, and Present Values of the Past and Future. Future Values are the unadjusted actual stream of payments stretching into the future (post-trial) or into the past (pre-trial). The Present Value of the future payments (post-trial) is the amount it would take, if invested today with interest compounding to equal the amount of the payments at the point they are to be made. Similarly, the Present Value of past payments (pre-trial) is the amount it would have become today had it been invested at the point it would have been made or earned.

Constant-Dollar Method

The constant-dollar method is the technique used to project the future lost income and household services. The dollars to be received in the future are assumed to have the same average purchasing power as dollars received today by way of removing the inflation component from the income, costs and interest rates. Future inflation rates, although impossible to predict, affect all the projected variables of income, costs and interest rates in roughly the same way, consequently, they all tend to move together. Thus, even though any one of the variables, considered alone, is difficult to predict, the relationship among the three variables is quite stable, and therefore, predictable.

After the inflation component is removed from projected income and from projected costs, it is also removed from the rate used to discount future dollars to present value in accordance with the constant-dollar method. Economic analysts tend to agree that the "true" zero-inflation rate of interest lies in the range of 2% to 4%, thus the present values of all future damages are calculated using an average of 3% as the discount rate. The use of the constant-dollar method and 3% interest rate has been ruled as reasonable by the U.S. Supreme Court in *Jones and Laughlin Steel Corporation v. Howard E. Pfeifer*.¹

Personal Consumption

Purchases made by an individual family member who uses family income to make these purchases exclusively for his or her own benefit, can be considered a personal consumption item. For example, haircuts, food, clothes, toiletries, theater tickets, jewelry, medical expenses, and similar items are for the benefit of but one family member. Should that person die, then those expenses will not continue to be borne by the family, and the money formerly used to pay for them is also no longer needed by the family.² The amount of income that would have gone toward the consumption of the decedent must be subtracted from the projected lost income and services when calculating the loss to the family as a result of death.

Dr. Gerald Martin, in his book, “Determining Economic Damages”, Table 22C, has averaged several studies that are considered to be “consensus” on personal consumption: BLS Bulletin 1865, Table 154, Revised Equivalence scales, Consumer Expenditure Surveys, various issues, Poverty Index, annually, Department of Commerce, Current Population Reports, P-60, #177 and Research by the Rand Institute, The Urban Institute, IBAR Settlement Company, Forensic Economic Services, and economists J. Burke, H. Rosen, E. Cheit, R. Peterson, L. Olson, T. Espinshade, J. Thornton, R. Gilbert, R. Brown, M. Harju, C. Adams, T. Depperschmidt, R. Dulaney, R. Patton, and D. Nelson.²

The average personal consumption percentage as calculated by Dr. Martin is 23.9% for a one parent, one child household, and 31.0% for a one parent, zero child household, thus these rates are used to account for Mary’s consumption of the projected lost income and services in the appropriate years.

Loss of Earnings

Income

Mary was employed as a Housekeeper at the Large Hotel in Batesville, Mississippi since May of 2002. She had a high school diploma and completed one year of higher education after attending a Community College. The current national median wage earned by women in the “Maid and Housekeeping Cleaners” industry³ is \$17,056. For purposes of this analysis, this wage base is used as the starting point for lost earnings as this is considered a minimum earning potential for Mary.

The tables on pages 6 and 7 calculate the annual loss of income, less a percentage for personal consumption, plus the annual loss of fringe benefits (table on page 8) from the date of death through her work life expectancy⁴ ending in 2033. The table on page 9, calculates the Annual Loss of Household Services (discussed in more detail on page 5) from the date of death through her life expectancy⁵ ending in 2059. The pre-trial losses are compounded with interest to present value to the Trial Date using a 5% interest rate, and the post-trial losses are discounted to present value to the Trial Date using the discount rate of 3%. The post-trial losses employ the constant-dollar method of interest rate offset.

The losses of Income for pre-trial and post-trial Earnings are indexed annually to reflect merit raises and increases in productivity. For pre-trial, the actual growth rates from government labor studies⁶ for those years are used. For post-trial, the real earnings growth rate that is expected to exceed inflation is used, i.e., the inflation component is removed in accordance with the constant-dollar method. In recent years, earnings have grown an average of 1% to 2% per year faster than inflation, thus the real earnings growth rate, without inflation, of 1% is used in the calculation for post-trial losses.

Fringe Benefits

Mary’s estimated lost Fringe Benefits are calculated based on percentages of the estimated income lost throughout her work life expectancy. The percentages are compiled annually in a national business survey conducted by the U.S. Chamber of Commerce⁷ and are applied in the tables on pages 6 and 7, Pre-Trial and Post-Trial Lost Earnings and Household Services. The fringe benefits associated with a job in the Maid and Housekeeping Cleaners industry are minimal, with an estimated percentage totaling 15.1%. See the table on page 8, Fringe Benefits Choice Information, for details.

Loss of Household Services

Mary's death will also result in a loss of Household Services which include those tasks performed for no payment that maintain and enhance the lives of those that occupy the household, such as a parent, spouse or children. Such tasks include food preparation and clean up, house cleaning, automobile care and maintenance, yard maintenance, gardening and child care, among many others. The services that can no longer be performed are considered an economic loss because, even though they may not be directly compensated as is office work, this work has value to the household, nonetheless.

Throughout Mary's remaining life, she presumably would have been able to perform these services. As a result of her death, it is assumed that the tasks will:

- not be done at all or not as often,
- be done by someone else in the household (at the expense of other things the "someone else" might have been doing), or
- require outside assistance which may have to be paid for that otherwise would not.

No matter which choice is made, something of economic value is lost to the family because of Mary's inability to do these activities.

Several published economic studies have been conducted which measure the loss of the value of the services, whether Mary was working or not, based on an average market wage rate for those services. The calculations in this report are based on the study, "The Dollar Value of a Day: 1999 Dollar Valuation". The study concludes that the wage rate of \$9.84 per hour is the average hourly value of the lost services for a single, working female with one child,⁸ and reveals that the hours of weekly service change as the subject ages and the child(ren) in the household age. The wage rate is indexed annually employing the constant-dollar method of interest rate offset by using the real average growth rate, of 1%. The Personal Consumption rates of 23.9% and 31.0% are deducted from the loss calculations in the appropriate years. See the table, Lost Production of Household Services, on page 9.

Damages Summary

The total dollar value that Mary would have received from the date of death throughout her lifetime is estimated to be \$1,252,000 with the present value, lump-sum equivalent being \$740,000. Details follow in the tables on pages 6-7.

Damages Summary

Type of Damage	Future Values		Present Values	
	Past	Future	Past	Future
Lost Income:	\$31,704	\$382,256	\$33,648	\$266,977
Lost Fringe Benefits:	\$6,291	\$79,294	\$6,677	\$54,872
Lost Household Services:	\$34,314	\$718,489	\$36,418	\$341,826
Medical and Other Damages:	\$0	\$0	\$0	\$0
Total Damages:	\$72,309	\$1,180,039	\$76,743	\$663,674
Grand Total Damages:	\$1,252,348		\$740,418	
Rounded:	\$1,252,000		\$740,000	

Pre-Trial Lost Earnings and Household Services

Damages-Year Fraction: 0.9699 Days in Damages-Year: 366
 Trial-Year Fraction: 0.4548 Days in Trial-Year: 365
 Pre-Trial Interest Rate: 5.0%

Occupation: Maids and housekeeping cleaners
 Damages-Year Wage: \$17,056 (Median wage for women in this occupation)
 Fringe Benefits as % of Income: 15.10%

Date From	Date To	Earnings Growth	Income						Household Services				Total Annual Loss		
			Decedent's Income	Cnsmptn Percent	Personal Cnsmptn	Lost Income	Present Value	Lost Fr. Benefits	Present Value	Decedent's Services	Personal Cnsmptn	Lost Services	Present Value	Total Loss	Pres. Value Total Loss
01/12/2004	12/31/2004	0.79%	16,543	23.9%	3,954	12,589	13,880	2,498	2,754	17,867	4,270	13,597	14,990	28,684	31,624
01/01/2005	12/31/2005	1.40%	17,190	23.9%	4,108	13,082	13,736	2,596	2,726	18,678	4,464	14,214	14,925	29,892	31,386
01/01/2006	06/15/2006	0.59%	7,928	23.9%	1,895	6,033	6,033	1,197	1,197	8,545	2,042	6,503	6,503	13,733	13,733
Totals:			41,661		9,957	31,704	33,648	6,291	6,677	45,090	10,777	34,314	36,418	72,309	76,743

Post-Trial Lost Earnings and Household Services

Trial Date: 06/15/2006 End of Life Date: 03/01/2059
 End of Worklife Date: 11/30/2032 Life Date Fraction: 0.71
 Worklife Date Fraction: 0.46

Year Ending	Earnings Growth	Discount Rate	Income						Household Services				Total Annual Loss		
			Decedent's Income	Cnsmptn Percent	Personal Cnsmptn	Lost Income	Present Value	Lost Fr. Benefits	Present Value	Decedent's Services	Personal Cnsmptn	Lost Services	Present Value	Total Loss	Pres. Value Total Loss
06/15/2007	1.00%	3.00%	17,431	23.9%	4,166	13,265	13,265	2,632	2,632	18,977	4,536	14,441	14,441	30,339	30,339
06/15/2008	1.00%	3.00%	17,605	23.9%	4,208	13,397	13,007	2,658	2,581	14,535	3,474	11,061	10,739	27,116	26,327
06/15/2009	1.00%	3.00%	17,781	23.9%	4,250	13,531	12,755	2,685	2,531	14,680	3,509	11,172	10,530	27,388	25,816
06/15/2010	1.00%	3.00%	17,959	23.9%	4,292	13,667	12,507	2,712	2,482	14,827	3,544	11,283	10,326	27,662	25,315
06/15/2011	1.00%	3.00%	18,139	23.9%	4,335	13,804	12,264	2,739	2,434	14,975	3,579	11,396	10,125	27,939	24,823
06/15/2012	1.00%	3.00%	18,320	23.9%	4,378	13,942	12,026	2,766	2,386	15,125	3,615	11,510	9,929	28,218	24,341
06/15/2013	1.00%	3.00%	18,503	23.9%	4,422	14,081	11,792	2,794	2,340	15,276	3,651	11,625	9,736	28,500	23,868
06/15/2014	1.00%	3.00%	18,688	23.9%	4,466	14,222	11,563	2,822	2,295	15,429	3,688	11,741	9,547	28,785	23,405
06/15/2015	1.00%	3.00%	18,875	23.9%	4,511	14,364	11,339	2,850	2,250	15,583	3,724	11,859	9,362	29,073	22,950
06/15/2016	1.00%	3.00%	19,064	23.9%	4,556	14,508	11,119	2,879	2,207	15,739	3,762	11,977	9,180	29,364	22,505
06/15/2017	1.00%	3.00%	19,255	23.9%	4,602	14,653	10,903	2,908	2,164	15,896	3,799	12,097	9,001	29,658	22,069
06/15/2018	1.00%	3.00%	19,448	23.9%	4,648	14,800	10,692	2,937	2,122	16,055	3,837	12,218	8,827	29,955	21,640
06/15/2019	1.00%	3.00%	19,642	23.9%	4,694	14,948	10,484	2,966	2,080	16,216	3,876	12,340	8,655	30,254	21,220
06/15/2020	1.00%	3.00%	19,838	23.9%	4,741	15,097	10,280	2,996	2,040	16,378	3,914	12,464	8,487	30,557	20,807
06/15/2021	1.00%	3.00%	20,036	23.9%	4,789	15,247	10,080	3,025	2,000	16,542	3,954	12,588	8,322	30,861	20,403
06/15/2022	1.00%	3.00%	20,236	31.0%	6,273	13,963	8,962	3,056	1,962	16,707	5,179	11,528	7,399	28,547	18,323
06/15/2023	1.00%	3.00%	20,438	31.0%	6,336	14,102	8,788	3,086	1,923	12,300	3,813	8,487	5,289	25,676	16,000
06/15/2024	1.00%	3.00%	20,642	31.0%	6,399	14,243	8,617	3,117	1,886	12,423	3,851	8,572	5,186	25,932	15,689
06/15/2025	1.00%	3.00%	20,848	31.0%	6,463	14,385	8,450	3,148	1,849	12,548	3,890	8,658	5,086	26,191	15,384
06/15/2026	1.00%	3.00%	21,056	31.0%	6,527	14,529	8,285	3,179	1,813	12,673	3,929	8,744	4,987	26,452	15,085
06/15/2027	1.00%	3.00%	21,267	31.0%	6,593	14,674	8,125	3,211	1,778	12,800	3,968	8,832	4,890	26,717	14,793
06/15/2028	1.00%	3.00%	21,480	31.0%	6,659	14,821	7,967	3,243	1,743	16,891	5,236	11,655	6,265	29,719	15,975
06/15/2029	1.00%	3.00%	21,695	31.0%	6,725	14,970	7,812	3,276	1,710	17,060	5,288	11,771	6,143	30,017	15,665
06/15/2030	1.00%	3.00%	21,912	31.0%	6,793	15,119	7,661	3,309	1,677	17,230	5,341	11,889	6,024	30,317	15,361
06/15/2031	1.00%	3.00%	22,131	31.0%	6,861	15,270	7,512	3,342	1,644	17,402	5,395	12,008	5,907	30,620	15,063
06/15/2032	1.00%	3.00%	22,352	31.0%	6,929	15,423	7,366	3,375	1,612	17,577	5,449	12,128	5,792	30,926	14,770
06/15/2033	1.00%	3.00%	10,481	31.0%	3,249	7,232	3,353	1,583	734	17,752	5,503	12,249	5,680	21,064	9,767
06/15/2034	1.00%	3.00%		31.0%	0	0	0	0	0	17,930	5,558	12,372	5,570	12,372	5,570
06/15/2035	1.00%	3.00%		31.0%	0	0	0	0	0	18,109	5,614	12,495	5,461	12,495	5,461
06/15/2036	1.00%	3.00%		31.0%	0	0	0	0	0	18,290	5,670	12,620	5,355	12,620	5,355
06/15/2037	1.00%	3.00%		31.0%	0	0	0	0	0	18,473	5,727	12,746	5,251	12,746	5,251
06/15/2038	1.00%	3.00%		31.0%	0	0	0	0	0	17,079	5,295	11,785	4,714	11,785	4,714
06/15/2039	1.00%	3.00%		31.0%	0	0	0	0	0	17,250	5,347	11,902	4,622	11,902	4,622
06/15/2040	1.00%	3.00%		31.0%	0	0	0	0	0	17,422	5,401	12,021	4,532	12,021	4,532
06/15/2041	1.00%	3.00%		31.0%	0	0	0	0	0	17,597	5,455	12,142	4,444	12,142	4,444
06/15/2042	1.00%	3.00%		31.0%	0	0	0	0	0	17,773	5,509	12,263	4,358	12,263	4,358
06/15/2043	1.00%	3.00%		31.0%	0	0	0	0	0	17,950	5,565	12,386	4,273	12,386	4,273
06/15/2044	1.00%	3.00%		31.0%	0	0	0	0	0	18,130	5,620	12,510	4,190	12,510	4,190
06/15/2045	1.00%	3.00%		31.0%	0	0	0	0	0	18,311	5,676	12,635	4,109	12,635	4,109
06/15/2046	1.00%	3.00%		31.0%	0	0	0	0	0	18,494	5,733	12,761	4,029	12,761	4,029
06/15/2047	1.00%	3.00%		31.0%	0	0	0	0	0	18,679	5,791	12,889	3,951	12,889	3,951
06/15/2048	1.00%	3.00%		31.0%	0	0	0	0	0	29,250	9,068	20,183	6,007	20,183	6,007
06/15/2049	1.00%	3.00%		31.0%	0	0	0	0	0	29,543	9,158	20,384	5,890	20,384	5,890
06/15/2050	1.00%	3.00%		31.0%	0	0	0	0	0	29,838	9,250	20,588	5,776	20,588	5,776
06/15/2051	1.00%	3.00%		31.0%	0	0	0	0	0	30,136	9,342	20,794	5,664	20,794	5,664
06/15/2052	1.00%	3.00%		31.0%	0	0	0	0	0	30,438	9,436	21,002	5,554	21,002	5,554
06/15/2053	1.00%	3.00%		31.0%	0	0	0	0	0	30,742	9,530	21,212	5,446	21,212	5,446
06/15/2054	1.00%	3.00%		31.0%	0	0	0	0	0	31,050	9,625	21,424	5,340	21,424	5,340
06/15/2055	1.00%	3.00%		31.0%	0	0	0	0	0	31,360	9,722	21,638	5,236	21,638	5,236
06/15/2056	1.00%	3.00%		31.0%	0	0	0	0	0	31,674	9,819	21,855	5,135	21,855	5,135
06/15/2057	1.00%	3.00%		31.0%	0	0	0	0	0	31,990	9,917	22,073	5,035	22,073	5,035
06/15/2058	1.00%	3.00%		31.0%	0	0	0	0	0	24,517	7,600	16,917	3,746	16,917	3,746
03/01/2059	1.00%	3.00%		23.9%	0	0	0	0	0	15,357	4,761	10,596	2,278	10,596	2,278
Totals:			525,122		142,866	382,256	266,977	79,294	54,872	1,016,981	298,491	718,489	341,826	1,180,039	663,674

Fringe Benefits Choice Information

Occupation	Maids & Housekeeping Cleaners	
Job Date	01/12/04	
Company Group	All Non-manufacturing	
Industry	Hospitality	
Fringe Benefit	Percent of Earnings	Annual Value
Federally-Required Payroll Taxes	8.0%	1,323
Unemployment Compensation		
Workers' Compensation Insurance		
Payments for Holidays		
Paid Breaks, Etc.		
Sick Leave Pay		
Payments for Vacations		
Paid Time Off		
Family and Medical Leave Pay		
STD, Sickness or Accident Insurance		
LTD or Wage Continuation		
Medical Insurance Premiums	7.1%	1,175
Dental Insurance Premiums		
Vision Care		
Retiree Medical Insurance Premiums		
Life Insurance and Death		
Prescription Drug Coverage		
Defined Benefit Pension Plan		
Cash Balance or Other Hybrid Plan		
401K and similar		
Profit-Sharing		
Stock Bonus/ESOPs		
Severance Pay		
Child Care		
Employee Education Expenditures		
Discounts		
Administrative and Other		
Total	15.1%	2,498

Lost Production of Household Services

Status: L-Employed full time, 1 child, less than 5 T-Employed full time, no children, age 55+
 M-Employed full time, 1 child, more than 5 J-Retired, age 65-74
 R-Employed full time, no children, age 18-45 K-Retired, age 75+
 S-Employed full time, no children, age 45-55

Year Ending	Status	Hours Weekly	Pay Rate	Total Services	Cnsmptn Percent	Personal Cnsmptn	Lost Services	Present Value
12/31/2004	L	36.0	9.84	17,867	23.9%	4,270	13,597	14,990
12/31/2005	L	36.0	9.98	18,678	23.9%	4,464	14,214	14,925
06/15/2006	L	36.0	10.04	8,545	23.9%	2,042	6,503	6,503
06/15/2007	L	36.0	10.14	18,977	23.9%	4,536	14,441	14,441
06/15/2008	M	27.3	10.24	14,535	23.9%	3,474	11,061	10,739
06/15/2009	M	27.3	10.34	14,680	23.9%	3,509	11,172	10,530
06/15/2010	M	27.3	10.44	14,827	23.9%	3,544	11,283	10,326
06/15/2011	M	27.3	10.55	14,975	23.9%	3,579	11,396	10,125
06/15/2012	M	27.3	10.65	15,125	23.9%	3,615	11,510	9,929
06/15/2013	M	27.3	10.76	15,276	23.9%	3,651	11,625	9,736
06/15/2014	M	27.3	10.87	15,429	23.9%	3,688	11,741	9,547
06/15/2015	M	27.3	10.98	15,583	23.9%	3,724	11,859	9,362
06/15/2016	M	27.3	11.09	15,739	23.9%	3,762	11,977	9,180
06/15/2017	M	27.3	11.20	15,896	23.9%	3,799	12,097	9,001
06/15/2018	M	27.3	11.31	16,055	23.9%	3,837	12,218	8,827
06/15/2019	M	27.3	11.42	16,216	23.9%	3,876	12,340	8,655
06/15/2020	M	27.3	11.54	16,378	23.9%	3,914	12,464	8,487
06/15/2021	M	27.3	11.65	16,542	23.9%	3,954	12,588	8,322
06/15/2022	M	27.3	11.77	16,707	31.0%	5,179	11,528	7,399
06/15/2023	R	19.9	11.89	12,300	31.0%	3,813	8,487	5,289
06/15/2024	R	19.9	12.01	12,423	31.0%	3,851	8,572	5,186
06/15/2025	R	19.9	12.13	12,548	31.0%	3,890	8,658	5,086
06/15/2026	R	19.9	12.25	12,673	31.0%	3,929	8,744	4,987
06/15/2027	R	19.9	12.37	12,800	31.0%	3,968	8,832	4,890
06/15/2028	S	26.0	12.49	16,891	31.0%	5,236	11,655	6,265
06/15/2029	S	26.0	12.62	17,060	31.0%	5,288	11,771	6,143
06/15/2030	S	26.0	12.74	17,230	31.0%	5,341	11,889	6,024
06/15/2031	S	26.0	12.87	17,402	31.0%	5,395	12,008	5,907
06/15/2032	S	26.0	13.00	17,577	31.0%	5,449	12,128	5,792
06/15/2033	S	26.0	13.13	17,752	31.0%	5,503	12,249	5,680
06/15/2034	S	26.0	13.26	17,930	31.0%	5,558	12,372	5,570
06/15/2035	S	26.0	13.39	18,109	31.0%	5,614	12,495	5,461
06/15/2036	S	26.0	13.53	18,290	31.0%	5,670	12,620	5,355
06/15/2037	S	26.0	13.66	18,473	31.0%	5,727	12,746	5,251
06/15/2038	T	23.8	13.80	17,079	31.0%	5,295	11,785	4,714
06/15/2039	T	23.8	13.94	17,250	31.0%	5,347	11,902	4,622
06/15/2040	T	23.8	14.08	17,422	31.0%	5,401	12,021	4,532
06/15/2041	T	23.8	14.22	17,597	31.0%	5,455	12,142	4,444
06/15/2042	T	23.8	14.36	17,773	31.0%	5,509	12,263	4,358
06/15/2043	T	23.8	14.50	17,950	31.0%	5,565	12,386	4,273
06/15/2044	T	23.8	14.65	18,130	31.0%	5,620	12,510	4,190
06/15/2045	T	23.8	14.80	18,311	31.0%	5,676	12,635	4,109
06/15/2046	T	23.8	14.94	18,494	31.0%	5,733	12,761	4,029
06/15/2047	T	23.8	15.09	18,679	31.0%	5,791	12,889	3,951
06/15/2048	J	36.9	15.24	29,250	31.0%	9,068	20,183	6,007
06/15/2049	J	36.9	15.40	29,543	31.0%	9,158	20,384	5,890
06/15/2050	J	36.9	15.55	29,838	31.0%	9,250	20,588	5,776
06/15/2051	J	36.9	15.71	30,136	31.0%	9,342	20,794	5,664
06/15/2052	J	36.9	15.86	30,438	31.0%	9,436	21,002	5,554
06/15/2053	J	36.9	16.02	30,742	31.0%	9,530	21,212	5,446
06/15/2054	J	36.9	16.18	31,050	31.0%	9,625	21,424	5,340
06/15/2055	J	36.9	16.34	31,360	31.0%	9,722	21,638	5,236
06/15/2056	J	36.9	16.51	31,674	31.0%	9,819	21,855	5,135
06/15/2057	J	36.9	16.67	31,990	31.0%	9,917	22,073	5,035
06/15/2058	K	28.0	16.84	24,517	31.0%	7,600	16,917	3,746
03/01/2059	K	28.0	17.01	15,357	31.0%	4,761	10,596	2,278
Totals:				1,062,071		309,268	752,803	378,244

Reference Summary

¹ Constant-Dollar Method and Discount Rate

Jones and Laughlin Steel Corporation v. Howard E. Pfeifer (462 U.S. 523; 1983; US Supreme Court).

² Personal Consumption of Earnings

"Determining Economic Damages," Dr. Gerald Martin, James Publishing, 2005, §520, Table 22C, updated annually.

³ Wage Information

U.S. Dept. of Labor, Bureau of Labor Statistics in "Household Data, Annual Averages, Table 39: Median weekly earnings of full-time wage and salary workers by detailed occupation and sex 2005" (Maids and Housekeeping Cleaners).

⁴ Work Life Expectancy

The Markov (Increment-Decrement) Model of Labor Force Activity: New Results Beyond Work-Life Expectancies, Gary Skoog and James Ciecka, Journal of Legal Economics, Spring-Summer 2001, Vol. 11, Number 1, for women active in the work force, with some college but no degree.

⁵ Life Expectancy

"Arias, E., United States Life Tables, 2002, National Vital Statistics Reports, Vol. 53, No. 6. Hyattsville, MD, National Center for Health Statistics, 2004".

⁶ Real Earnings Growth Rate

"Average Hourly Earnings, Total Private (\$ per hr, Seasonally Adjusted)", Bureau of Labor Statistics, 2005 Survey.

⁷ Fringe Benefits

"The Employee Benefits Study 2004", U.S. Chamber of Commerce, Statistics and Research Center.

⁸ Lost Household Services

"The Dollar Value of a Day: 1999 Dollar Valuation", Shawnee Mission, Kansas, 2001, for women employed full time with one child.

Software

Personal Injury-Economist, Version 4.5, 2005 Update, developed by Melvin C. Fredlund, Ph.D. of Advocate Software, Inc.

General Reference

"Determining Economic Damages," Dr. Gerald Martin, James Publishing, 2005, updated annually.