

# Useful Information for Economic Experts in Personal Injury Disputes

The following information about the plaintiff is useful to economic experts to calculate economic losses in personal injury disputes.

## Background

*(To determine certain components of the plaintiff's economic losses, we regularly rely on statistical tables, which depend on their socio-economic characteristics (for example, age and education).)*

- Plaintiff's date of birth.
- Plaintiff's relationship status and tax filing status.
- Does the plaintiff live in a house or an apartment/condo? Do they own or rent?  
*(Whether the plaintiff lives in a house or an apartment/condo, and whether they own or rent their residence, can affect how we calculate lost household services.)*
- Who does the plaintiff live with? Do they have any children or other dependents? If yes, how are they related to the plaintiff and what are their dates of birth?  
*(The plaintiff's living situation (tax filing status and number of dependents) can affect how the plaintiff files their tax returns, and can affect how we calculate their income tax liability.)*

## Education

- Plaintiff's level of education.
- Does the plaintiff have a high school diploma or a GED? If not, how many years of school did the plaintiff complete?  
*(Statistical tables for work-life expectancy consider a high school diploma differently than a GED.)*
- Did the plaintiff attend college? Do they have an associate's degree, a bachelor's degree, a master's degree, or a professional or doctoral degree?

## Employment History

- The following information about each job the plaintiff held in the past few years is useful.
  - Employer
  - Start date and end date, or approximate length of employment
  - Position and job title (if multiple positions, the start date and end date for each position)
  - Location of employment (city, state; onshore or offshore; etc.)
  - Type of employment (employee, contractor, self-employed)
  - Pay rate and wages (hourly pay rate or annual salary for each position)
  - Work schedule (full-time or part-time; hours per week, days per week, overtime; shift (standard hours, or number of days on/number of days off); seasonal; duration: was it a permanent job, or was it only for a fixed length of time or for a specific project)
  - Employment benefits (for example, different types of insurance, retirement and savings plans, etc.)
  - Did the plaintiff incur any unreimbursed work expenses, or did their employer provide all the necessary supplies, tools, equipment, etc.?
  - Reason for employment ending

## Effect of Injury on Employment

- Has the plaintiff worked since the injury?

### ***If the plaintiff did not continue working after the injury:***

- When did they stop working?
- Why did they stop working?
- What was the last date they were paid for?  
*(Employers sometimes continue paying employees their regular wages after they stop working. It is important to differentiate between regular wages and workers compensation or other types of payments.)*
- What are their plans for future employment?
- What steps are they taking to achieve their future employment plans?
  - Have they applied for any jobs since they stopped working?
  - Have they returned to school, or do they plan to?

### ***If the plaintiff did continue working after the injury:***

*(This information is relevant when calculating mitigating earnings.)*

- Are they currently working?
- Are they working for the same employer as at the time of the injury?
- Are they working at the same job as at the time of the injury? If not, what are the differences between the plaintiff's current employment and their employment at the time of the injury?
- Do they plan to continue working at this job? If not, what are their plans?

## Household Chores

*(Household chores are activities such as cleaning, cooking, yard work, and caring for children.)*

- Before the injury:
  - Did the plaintiff perform household chores?
  - Which household chores did the plaintiff perform?
  - How many hours did the plaintiff spend performing these household chores in an average week?
  - Did the plaintiff pay anyone to perform household chores?
- After the injury:
  - Does the plaintiff perform household chores?
  - Which household chores does the plaintiff perform?
  - If the plaintiff cannot perform some household chores:
    - Why are they no longer able to perform these household chores?
    - Will they be able to perform these household chores in the future?
    - When do they expect to be able to perform these household chores again?
    - Do they pay anyone to perform household chores?

For more information about the use of economic experts in personal injury disputes, [contact us](#). We are here to help.