Smith Economics Group, Ltd.

A Division of Corporate Financial Group

Economics / Finance / Litigation Support

Stan V. Smith, Ph.D.
President

May 20, 2022

Mr. Jay H. Krulewitch
Krulewitch Law Office
P.O. Box 33546
Seattle, WA 98133

  Re: Garcia

Dear Mr. Krulewitch:

You have asked me to calculate the value of certain losses
subsequent to the injury of Heath Garcia. These losses are: (1)
the loss of wages and employee benefits; (2) the loss of
housekeeping and household management services; (3) the cost of
future medical care; (4) the reduction in value of life ("RVL"),
also known as loss of enjoyment of life; and (5) the loss of the
society or relationship sustained by Mr. Garcia's family.

QUALIFICATIONS AND EXPERIENCE

I am President of Smith Economics Group, Ltd., headquartered in
Chicago, IL, which provides economic and financial consulting
nationwide. I have worked as an economic and financial
consultant since 1974, after completing a Research Internship at
the Federal Reserve, Board of Governors, in Washington, D.C. My
curriculum vitae lists all my publications in the last 10 years
and beyond.

I received my Bachelor's Degree from Cornell University. I
received a Master's Degree and my Ph.D. in Economics from the
University of Chicago; Gary S. Becker, Nobel Laureate 1992, was
my Ph.D. thesis advisor. The University of Chicago is one of the
world's preeminent institutions for the study of economics, and
the home of renowned research in the law and economics movement.

As President of Smith Economics, I have performed economic
analyses in a great variety of engagements, including damages
analysis in personal injury and wrongful death cases, business
valuation, financial analysis, antitrust, contract losses, a wide
range of class action matters, employment discrimination,
defamation, and intellectual property valuations including
evaluations of reasonable royalty.

I have more than 40 years of experience in the field of
economics. I am a member of various economic associations and
served for three years as Vice President of the National
Association of Forensic Economics (NAFE) which is the principal

association in the field. I was also on the Board of Editors of the peer-reviewed journal, the Journal of Forensic Economics, for over a decade; I have also published scholarly articles in this journal. The JFE is the leading academic journal in the field of Forensic Economics.

I wrote the first textbook on Forensic Economic Damages that has been used in university courses such as the University of Wisconsin, Penn State University, and in various other states. As an adjunct professor, I created and taught the first course in Forensic Economics nationwide, at DePaul University in Chicago.

I am the creator and founder of Ibbotson Associates' Stock, Bonds, Bills, and Inflation (SBBI) Yearbook, Quarterly, Monthly, and SBBI/PC Services. SBBI is generally regarded by academics in the field of finance as the most widely accepted source of statistics on the rates of return on investment securities. SBBI was originally published by Ibbotson Associates, then by Morningstar, Inc., and is now currently published by Duff & Phelps. The original SBBI series generated what became a six-book set universally used for business valuation, and currently available on an online platform. These data series are widely relied upon and regarded as the most accepted and definitive scholarly references by the academic, actuarial and investment community, and in courts of law. All three publishers of the SBBI series acknowledge me as the founder in 1983, for my "invaluable role" as having "originated the idea" of SBBI, which I then implemented while Managing Director at Ibbotson Associates.

I have performed economic analysis in many thousands of cases in almost every state and federal jurisdiction since the early 1980s.

BACKGROUND

Heath Garcia is a Hispanic, married male, who was born on September 21, 1981, and injured on September 17, 2017 at the age of 35.9 years. Mr. Garcia will be 41.1 years old at the estimated trial or resolution date of November 1, 2022, with a remaining life expectancy estimated at 40.1 years. This data is from the National Center for Health Statistics, United States Life Tables, 2019, Vol. 69, No. 12, National Vital Statistics Reports, 2021.

In order to perform this evaluation, I have reviewed the following materials: (1) VA Rehabilitation Evaluation; (2) Case Management Supervision Report; (3) Counseling Record; (4) Dr. Jack Schuberth's Medical Report dated May 1, 2022; (5) Ms. Cloie Johnson's Vocational and Life Care Report dated May 20, 2022; (6) Dr. Andrew J. Saxon's report on Heath Garcia dated May 17, 2022;

(7) Dr. Kenneth Muscatel's Forensic Psychological Evaluation dated May 16, 2022; (8) Dr. Megan N. Carter's Psychological Evaluation Report dated May 18, 2022; (9) the Complaint; (10) Heath Garcia's VA Medical Records; (11) Heath Garcia's Naval File; (12) Rehabilitation Needs Inventory; (13) VA Rehabilitation Application; (14) Vocational Assistance Forms; and (15) an Informational Interview with Heath Garcia on May 9, 2022.

My methodology for estimating the losses, which is explained below, is generally based on past wage growth, interest rates, and consumer prices, as well as studies regarding the value of life. The effective net discount rate using statistically average wage growth rates and statistically average discount rates is 0.25 percent.

My estimate of the real wage growth rate is 1.00 percent per year. This growth rate is based on Business Sector, Hourly Compensation growth data from the Major Sector Productivity and Costs Index found at the U.S. Bureau of Labor Statistics website at www.bls.gov/data/home.htm, Series ID: PRS84006103, for the real increase in wages primarily for the last 20 years.

My estimate of the real discount rate is 1.25 percent per year. This discount rate is based on primarily the rate of return on short-term U.S. Treasury investment for the last 20 years. The data is from the statistical series H.15 Selected Interest Rates, published by the Board of Governors of the Federal Reserve System found at www.federalreserve.gov. This data is also published in the Economic Report of the President Table for "Bond yields and interest rates" for the real return on U.S. Treasury investments.

Estimates of real growth and discount rates are net of inflation based on the Consumer Price Index (CPI-U), published in monthly issues of the U.S. Bureau of Labor Statistics, CPI Detailed Report (Washington, D.C.: U.S. Government Printing Office) and available at the U.S. Bureau of Labor Statistics website at www.bls.gov/data/home.htm, Series ID: CUUR0000SA0. The rate of inflation for the past 20 years has been 2.31 percent.

I. LOSS OF WAGES AND EMPLOYEE BENEFITS - Annual Employment

Tables 1 through 7 and tables 8 through 14 show the loss of wages and benefits in two scenarios. Mr. Garcia was in the Navy at the time of his injury. He reports that he was a Chief Petty Officer at the time of his injury and that his pay grade was E-7.

Mr. Garcia reports that he enlisted in the Navy on May 21, 2001 after deciding that he needed to enlist to turn his life around. He states that he initially enlisted on a four year contract and began in the position of Master of Arms. Cloie B. Johnson, M.Ed., ABVE, CCM states in her vocational assessment of Heath

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Garcia dated May 20, 2022, that Mr. Garcia began his Naval career at E-2 pay grade and "was promoted to E-3 9 months after enlistment and E-4 another 9 months later." Ms. Johnson further states that two years later he was promoted to E-5, three to four years later promoted to E-6, and finally promoted to E-7 in 2014.

Mr. Garcia states as Chief Petty Officer, that he ran the entire security sector of Oakpark. He reports that he was in charge of and coordinated four duty sessions of ten duty personnel that included local law enforcement and federal officers. Mr. Garcia reports that prior to being injured he was overseeing and controlling over 10,000 acres of property. He states he would usually work from five in the morning to six at night every weekday. Mr. Garcia notes that even though he typically worked 60 hour weeks, that did not include emergency shifts that he was required to work.

Mr. Garcia reports that he would have earned his full pension benefits once he completed 20 years of service, but notes that he loved his career and wanted to stay in the Navy as long as he could. He states that he could have continued in the Navy until 30 years of service, and that he was on the fast track to becoming Senior Chief Petty Officer, which is pay grade E-8. Mr. Garcia reports that following his 30 years of service he thought about working as a corrections officer, police officer, civilian military work, and private security.

Cloie Johnson's vocational report states that Jumps LES showed Mr. Garcia's United States Navy Military earnings to be $68,829.18 in 2015, $103,309.08 in 2016, $76,880.64 in 2017, $80,421.48 in 2018, $83,002.56 in 2019, and partial year earnings of $21,828.68 in 2020. Ms. Johnson states that "Mr. Garcia had the demonstrated skills and abilities to work in the civilian sector as a Police Officer earning $83,347 annually."

Military personnel's total wage compensation consists of three elements: basic pay, basic allowance for housing ("BAH"), and basic allowance for subsistence ("BAS").

The annually released basic pay grade tables illustrates the monthly pay for military personnel depending on their pay grade and years of service. The monthly basic pay for personnel with pay grade E-7 and over 18 years of service was $4,892.40 in 2020 and $5,039.10 in 2021. The 2022 E-7 monthly basic pay is $5,232.60 for 20 years of service, $5,424.90 for 22 years of service, $5,528.10 for 24 years of service, and $5,921.10 for 26 years of service and above. Mr. Garcia reports that he was on the fast track to becoming Senior Chief Petty Officer, which is pay grade E-8. The E-8 monthly basic pay in 2022 is $5,860.50 for 20 years of service, $6,122.70 for 22 years of service, $6268.20 for 24 years of service, and $6,626.10 for 26 or more years of service.

Mr. Garcia confirmed in the informational interview that he earned BAH and BAS benefits and notes that his pay was increased because he has dependents. BAH is paid monthly to military personnel and included in their pay. BAH amounts are determined by pay grade, whether personnel has dependents or not, and location. BAH monthly pay for E-7, with dependents, and Whidbey Island, WA rates was $1,935 in 2020, $1,932 in 2021, and $2,178 in 2022. The BAH monthly pay for E-8 personnel with dependents and Whidbey Island, WA rates is $2,262 in 2022. The BAS pay per month was $256.68 in 2020, $266,18 in 2021, and $280.29 in 2022. Information about current and past BAH and BAS monthly rates can be found on federalpay.org/military/bah-bas.

I illustrate Mr. Garcia's wage loss in two scenarios. Scenario 1 shows his wage loss if he continued working at pay grade E-7 until he retired after 30 years of service, and Scenario two shows his wage loss if he were promoted to Senior Chief Petty Officer in 2022 and retired after 30 years of service. For both scenarios, I show Mr. Garcia's post-military retirement wages to be $83,347 based on Ms. Johnson's vocational report.

In Scenario 1, I illustrate Mr. Garcia's earnings loss to begin in March 2020 and his earning capacity to be $85,009 in 2020, $86,847 in 2021, and $92,291 in 2022. These wages are based on the above stated monthly basic pay, BAH, and BAS for each respective year. I show wages to grow by an estimated real military wage growth rate of 0.50 percent in 2023 and thereafter. This estimated future real growth rate is based on actual past real wage increases in monthly basic pay, BAH, and BAS pay. I show Mr. Garcia's earnings capacity to change to $83,347 in 2022 dollars in 2032 to reflect retirement from the military and him becoming a Police Officer.

In Scenario 2, I illustrate Mr. Garcia's wage loss to begin as it did in scenario one, but in 2022 I illustrate his earnings capacity increasing to $100,833 to reflect a promotion to Senior Chief Petty Officer and entering the E-8 pay grade. Wages are grown by an estimated real military wage growth rate of 0.50 percent in 2023 and thereafter. His 2022 earnings capacity is based on the basic monthly pay, BAH, and BAS for pay grade E-8 stated above. I also show him retiring from the military in 2031 and show his wage loss to be $83,347 in 2022 dollars beginning in 2032.

Employee benefit estimates are based on data from the U.S. Department of Labor, Bureau of Labor Statistics, Employer Cost of Employee Compensation - December 2021, 2022, found at www.bls.gov/ect. I have assumed that employee benefits grow at the same rate as wages and are discounted to present value at the same discount rate. Since these tables assume annual work, I do not include employee benefits relating to unemployment, injury, illness or disability; benefits are estimated at 44.90 percent of

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wages.

I assume annual employment each year and show the accumulation through life expectancy. While these tables are calculated through the end of life expectancy, the losses from working through any age can be read off the table.

Based on the above assumptions, my opinion of the wage loss is $5,106,243 in Scenario 1 and $5,236,962 in Scenario 2; these figures assumes work to age 81.2, but the ability to work through any assumed age may be read from Table 7 and Table 14; for example, the loss to age 67 is $3,561,595 in Scenario 1 and $3,692,314 in Scenario 2.

I(B). EARNINGS OFFSET

Tables 15 through 21 show the offset to wages. This offset is based on Mr. Garcia's stated past earnings, Cloie Johnson's vocational report, and an employment reduction based on his injuries. I use the same assumptions described above for annual employment and employee benefits.

Mr. Garcia reports that following his injury, he attempted to work at a mom-and-pop feed store. He states that he started working for them sometime in September of 2019 and continued working there until early Spring of 2020. Mr. Garcia reports that he worked in the back of the shop and was required to move feed bags, and that it caused him a lot of pain. He states that he earned approximately $17.00 per hour and worked 35 hours per week while working at the mom-and-pop feed store.

He reports that he is working on attaining his Master's Degree in Administry Leadership and Psychology from Brandman and Northwest University. Mr. Garcia states that he is planning on graduating in the Fall of 2023, and states that he would like to do Christian counseling. Cloie Johnson states that in the best case scenario for Mr. Garcia he will complete his training to become a mental health counselor or clergyman "and be capable of earning a salary commiserate with the median earnings for [mental health counselors and clergymen] in his labor market at the median level; $43,658.00 to $67,176.00." Cloie Johnson reports that in the worst case scenario Mr. Garcia will "be unable to successfully physically and/or psychologically rehabilitate to the point that he is able to participate in full-time, ongoing work as a licensed mental health therapist or clergyman." She notes that Mr. Garcia was deemed currently not psychologically fit to perform as a counselor or clergyman and that he "has significant permanent physical restrictions" that are detailed in other doctor reports.

Ms. Johnson's vocation report shows Mr. Garcia's 2020 Naval wages

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to be $21,829 for the partial year in 2020.

Mr. Garcia reports that because of his injuries, he has hammer toe, swelling, pain, gait deficiencies, and mobility restrictions in his ankle. Dr. Schuberth's report documents Mr. Garcia's physical injuries and his limitations. Dr. Schuberth states that "[Mr. Garcia's] injuries will significantly limit the type of gainful employment he might pursue, given his medical discharge from the Navy."

For people who have disabling injuries, such as Mr. Garcia, the probability of employment is significantly reduced. This reduction can mean fewer years worked in one's career (i.e. retiring early) or fewer hours worked in each year (i.e. shorter work week, more time off, etc). See the "Americans with Disabilities: 2014" study, Table A-2, Current Population Reports, US Census Bureau, November 2018, by Danielle M. Taylor. For persons with a condition characterized in the study as having a "difficulty walking" the probability of employment is 28.6 percent, compared to the 70.3 percent probability of employment for the total population. This is equal to a 40.68 percent employment probability for persons with difficulty walking compared to the total population. This employment probability may be applied to Mr. Garcia's future estimated earnings to determine the net offset.

I illustrate Mr. Garcia's offset earnings in 2020 to be $32,142 based on his actual 2020 Navy earnings and his estimated earnings at the feed store based on hourly earnings of $17.00 per hour, 35 hours of work per week, and four months of work in 2020. I conservatively show his future earnings offset to begin on September 1, 2023, approximately when Mr. Garcia will graduate, at $27,600 in 2022 dollars based on the clergyman earnings stated in Ms. Johnson's vocational report of $67,176 and an employment probability of 40.68 percent due to Mr. Garcia's difficulty walking. I grow future wages by an estimated national real wage growth rate of 1.00 percent in 2023 and thereafter. It should be noted that if Mr. Garcia is determined to be incapable of working in the future due to his injuries, he would not have a future offset wage.

I use the same assumptions described above for employee benefits. I show Mr. Garcia's 2020 benefits to be $10,441. This figure is based on his feed store employee benefits of 6.20 percent for the employer required contribution to Social Security, and 44.90 percent of benefits for his Navy earnings. His future offset benefits are illustrated to begin in fall 2023 at 25.20 percent of offset wages based on the statistical national average of employer contributions to employee benefits

Based on these assumptions, my opinion of the wage offset is

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$1,315,765 ▶ Table 21 for annual employment. This figure assumes work to age 81.2, but the ability to work through any assumed age may be read from Table 21. For example, the wage <u>offset</u> to age 67 is $878,315. For people who have disabling injuries, the total years expected to be worked in the future is reduced since the probability of employment is significantly reduced. See the "Americans with Disabilities: 2014" study, Table A-2, <u>Current Population Reports</u>, US Census Bureau, November 2018, Danielle M. Taylor.

The net loss of earnings capacity is $2,683,280 for Scenario 1 to age 67 and $2,813,999 for Scenario 2 to age 67.

II. LOSS OF HOUSEHOLD/FAMILY HOUSEKEEPING AND HOUSEHOLD MANAGEMENT SERVICES

Tables 22 through 24 show the pecuniary loss of tangible housekeeping chores and household management services. The number of hours of housekeeping and household management services, assuming Mrs. Garcia is employed, ranges from 13.22 to 22.79 hours per week and varies over time as family members age. This data is based on the <u>American Time Use Survey</u> published by the Bureau of Labor Statistics, <u>www.bls.gov/tus</u>, usefully summarized in a publication by Expectancy Data, <u>The Dollar Value of A Day: 2020 Dollar Valuation</u>, Shawnee Mission, KS, 2021. Mr. Garcia has difficulty in performing housekeeping and household management services. I illustrate the loss at 80 percent based on the interview. The conduct of an informational interview to obtain the "percentage diminution that the injured party can no longer perform" to assist in estimating the economic loss of housekeeping and household management services is recommended by National Association of Forensic Economics charter member Professor Gerald Martin, Ph.D. in his 2012 edition of <u>Determining Economic Damages</u>, Section 611, James Publishing Group, Santa Ana, CA. Dr. Martin recommended that the analyst ask "to what degree the performance of those services has been lost," and claims that this assessment can provide the analyst "a basis for his estimate." Subsequent editions continue to recommend this approach. Dr. Martin's <u>Determining Economic Damages</u> has been a widely referenced textbook in the field of Forensic Economics.

The hourly value of the housekeeping and household management services is based on the mean hourly earnings of carpenters; maintenance and repair workers; painters, construction and maintenance; childcare workers; waiters and waitresses; cooks, private household; laundry and dry-cleaning workers; maids and housekeeping cleaners; landscaping and groundskeeping workers; bookkeeping, accounting and auditing clerks; and passenger vehicle drivers, which is $18.56 per hour in year 2021 dollars. This wage data is based on information from the U.S. Bureau of

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Labor Statistics, Occupational Employment Statistics, May 2021 National Occupational Employment and Wage Statistics found at www.bls.gov/oes. This figure is corroborated by the average hourly values published by Expectancy Data, The Dollar Value of A Day: 2020 Dollar Valuation, Shawnee Mission, KS, 2021, which is also based on the BLS Occupational Employment Statistics. The hourly value of these services grows at the same rate as the wage growth rate discussed above.

I assess such services at their estimated market value which includes a conservative estimate of 50 percent hourly non-wage component reasonably charged by agencies or free-lance individuals who supply such services on a part-time basis, and who are responsible for advertising, hiring and vetting, training, insuring and bonding the part-time service provider, and who are also responsible for pay-related costs such as social security contributions, etc. If a person were to hire a free-lance employee directly instead of going through an agency, then he or she would have to take on the responsibility for all the non-wage costs that the agency would otherwise incur and then charge for. The money the person would pay directly in wages would be only a portion of the total costs. The total costs would include those items discussed above that the agency would otherwise incur.

Adding the non-wage component to the hourly wage is consistent with labor market theory and competitive market behavior. Peer-reviewed economic research supports this theory and shows that the non-wage costs can average up to 300 percent for the wage. See, for example, Cushing, Matthew J. and David I. Rosenbaum, "Valuing Household Services: A New Look at the Replacement Cost Approach," Journal of Legal Economics, Vol 19, No. 1, 2012, pp. 37-60, wherein the authors found that non-wage costs exceed wage costs by 167 percent. This is more than triple the 50 percent non-wage costs amount I use, discussed above. Also see Smith, David A., Stan V. Smith, and Stephanie R. Uhl, "Estimating the Value of Family Household Management Services: Approaches and Markups," Forensic Rehabilitation & Economics, Vol 3, No. 2, 2010, pp. 85-94. According to this research, the statistical probability is 99 percent that the non-wage costs exceed 250 percent of the wage cost. The use of only a 50 percent non-wage cost makes my estimate very conservative, and it far more than compensates for two possible variations: variations in the national wage depending on locality, and variations in different types of services actually performed in the household. Thus even if one or more of the different types of services are not performed, and even if the services are provided in low wage areas, my use of the low, 50 percent non-wage costs more than compensates for these factors.

For comparison purposes, according to Merry Maids, a national home cleaning service agency, the charges for their services

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within the largest 100 Metropolitan Statistical Areas with populations of 500,000 and up range from $40 to $65 per hour, averaging $49 per hour, in 2012. This hourly rate reflects non-wage costs of 250 percent of wages, and after adjusting for market factors, is four times the non-wage costs figure that I use, resulting in an hourly rate of more than double the rate that I use. Thus, my use of only a 50 percent addition for non-wage costs is, in fact, very conservative.

Based on these assumptions, and Heath Garcia's life expectancy of 81.2 years, my opinion of the loss of the value of housekeeping and household management services is $870,494 ► Table 24.

III. COST OF FUTURE LIFE CARE

Table 25 shows the cost of future life care. The present value of life care is based on the life care plan included in Cloie Johnson's vocational report dated May 20, 2022. I assume real growth rates of 1.50 percent for medical services, 0.25 percent for medical commodities, 1.00 percent for non-medical services, and zero percent for non-medical commodities. These growth rates are based on medical care growth data primarily for the last 20 years found at the U.S. Bureau of Labor Statistics website at www.bls.gov/data/home.htm, Series ID: CUUR0000SAM1 and CUUR0000SAM2.

Based on this information, my opinion of the average cost of future life care is $1,176,643 ► Table 25, and can vary up or down by as much as 3.51 percent or $41,305.

The life care plan includes Household/Chore Services and Yard Work and Home Repair services. Some of these services may also be included in the Household Services section.

IV. REDUCTION IN VALUE OF LIFE

Economists have long agreed that life is valued at more than the lost earnings capacity. My estimate of the value of life is based on many economic studies on what we, as a contemporary society, actually pay to preserve the ability to lead a normal life. The studies examine incremental pay for risky occupations as well as a multitude of data regarding expenditure for life savings by individuals, industry, and state and federal agencies.

My estimate of the value of life is consistent with estimates published in other studies that examine and review the broad spectrum of economic literature on the value of life. Among these is "The Plausible Range for the Value of Life," Journal of

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Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 17-39, by T. R. Miller. This study reviews 67 different estimates of the value of life published by economists in peer-reviewed academic journals. The Miller results, in most instances, show the value of life to range from approximately $1.6 million to $2.9 million dollars in year 1988 after-tax dollars, with a mean of approximately $2.2 million dollars. In "The Value of Life: Estimates with Risks by Occupation and Industry," Economic Inquiry, Vol. 42, No. 1, May 2003, pp. 29-48, Professor W. K. Viscusi estimates the value of life to be approximately $4.7 million dollars in year 2000 dollars. An early seminal paper on the value of life was written by Richard Thaler and Sherwin Rosen, "The Value of Saving a Life: Evidence from the Labor Market." in N.E. Terlickyj (ed.), Household Production and Consumption. New York: Columbia University Press, 1975, pp. 265-300. The Meta-Analyses Appendix to this report reviews additional literature suggesting a value of life of approximately $5.4 million in year 2008 dollars.

Because it is generally accepted by economists, the economic methodology for the valuation of life has been found to meet the Daubert and Frye standards by many courts, along with the Rules of Evidence in many states nationwide. My testimony on the value of life has been accepted in approximately 225 state and federal cases nationwide in approximately two-thirds of the states and two-thirds of the federal jurisdictions. Testimony has been accepted by U.S. district and appellate courts as well as in state circuit, appellate, and supreme courts. Proof of general acceptance and other standards is found in a discussion of the extensive references to the scientific economic peer-reviewed literature on the value of life listed in the **Value of Life Appendix** to this report.

The underlying, academic, peer-reviewed studies fall into two general groups: (1) consumer behavior and purchases of safety devices; and (2) wage risk premiums to workers. I rely only on the peer-reviewed studies. One consumer safety study analyzes the costs of smoke detectors and the lifesaving reduction associated with them. One wage premium study examines the differential rates of pay for dangerous occupations with a risk of death on the job. Just as workers receive shift premiums for undesirable work hours, workers also receive a higher rate of pay to accept a increased risk of death on the job. There are also studies consisting of cost-benefit analyses of regulations. A cost-benefit study of government regulation examines the lifesaving resulting from the installation of smoke stack scrubbers at high-sulphur, coal-burning power plants. As a hypothetical example of the value of a statistical life (VSL) methodology, assume that a safety device such as a carbon monoxide detector costs $46 and results in lowering a person's risk of premature death by one chance in 100,000. The cost per life saved is obtained by dividing $46 by the one in 100,000

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probability, yielding $4,600,000.

Tables 26 through 31 are based on several factors:

    (1)   An assumed impairment rating benchmark, based on the interview, of 60 percent to 70 percent reduction in the ability to lead a normal life. The diminished capacity to lead a normal life reflects the impact on career, social and leisure activities, the activities of daily living, and the internal emotional state, as discussed in Berla, Edward P., Michael L. Brookshire and Stan V. Smith, "Hedonic Damages and Personal Injury: A Conceptual Approach," Journal of Forensic Economics, Vol 3, No. 1, Winter 1990, pp. 1-8. It is standard forensic economic practice to conduct an informational interview to obtain information regarding the percentage loss assessment to an injured party to assist in estimating economic losses, a practice recommended by National Association of Forensic Economics charter member Professor Gerald Martin, Ph.D. in his 2012 edition of Determining Economic Damages, Section 611, James Publishing Group, Santa Ana, CA. Dr. Martin recommended this approach stating that this assessment can provide the analyst "a basis for his estimate." Subsequent editions have continued to recommend this approach. Dr. Martin's Determining Economic Damages has been a widely referenced textbook in the field of Forensic Economics.;

    (2)   The central tendency of the range of the economic studies cited above which I conservatively estimate to be approximately $5.6 million in year 2022 dollars; and

    (3)   A life expectancy of 81.2 years.

Tables 26 through 28 are based on the lower estimated impairment rating; Tables 29 through 31 are based on the upper estimated impairment rating. Based on these values and life expectancy, my opinion of the reduction in the value of life is estimated at $3,526,460 ► Table 28 to $4,876,236 ► Table 31, averaging $4,201,348.

V. LOSS OF SOCIETY OR RELATIONSHIP

Tables 32 through 34 show the loss of society or relationship sustained by Mr. Garcia's wife. The value of the loss of society or relationship by family members with the injured can be based on a measure of the value of preserving the ability to live a normal life. This is discussed in the article, "The Relevance of Willingness-To-Pay Estimates of the Value of a Statistical Life in Determining Wrongful Death Awards," Journal of Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 75-89, by L. G. Chestnut and D. M. Violette. It is also discussed in "The Value of Life to Close Family Members: Calculating the Loss of Society and

Companionship," <u>The New Hedonics Primer for Economists and Attorneys</u>, Second Edition, Edited by Thomas R. Ireland and John O. Ward, Lawyers & Judges Publishing Co., 1997, pp. 377-384, by Stan V. Smith, and republished in "The Value of Life to Close Family Members: Calculating the Loss of Society and Companionship," <u>American Rehabilitation Economics Association 1997 Monograph</u>, pp. 10-16.

Based on a benchmark loss of 60 percent for each Valerine Garcia, my opinion of the loss of relationship as a result of the injury of Heath Garcia is $3,868,961 ► Table 34 for Valerine Garcia.

Other factors may be weighed to determine if these estimated losses for Heath Garcia should be adjusted because of special qualities or circumstances that economists do not as yet have a methodology for analysis.

In each set of tables, the estimated losses are calculated from September 17, 2017 through an assumed trial or resolution date of November 1, 2022, and from that date thereafter. The last table in each set accumulates the past and future estimated losses. These estimates are provided as a tool, an aid, and a guide to assist the evaluation by others.

All opinions expressed in this report are clearly labeled as such. They are rendered in accordance with generally accepted standards within the field of economics and are expressed to a reasonable degree of economic certainty. Estimates, assumptions, illustrations and the use of benchmarks, which are not opinions, but which can be viewed as hypothetical in nature, are also clearly disclosed and identified herein.

In my opinion, it is reasonable for experts in the field of economics and finance to rely on the materials and information I reviewed in this case for the formulation of my substantive opinions herein.

If additional information is provided to me, which could alter my opinions, I may incorporate any such information into an update, revision, addendum, or supplement of the opinions expressed in this report.

If you have any questions, please do not hesitate to call me.

Sincerely,

Stan V. Smith, Ph.D.
President

APPENDIX: HOUSEHOLD SERVICES VALUATION

Courts have long recognized claims for the value of tangible household family services as an element of damages in personal injury and wrongful death cases, as an aspect of the pecuniary loss in such cases. These services are those that are provided by the injured family member to himself or herself and to other family members, without charge or cost. Other family members who may receive such services can include spouses, children, parents or siblings; such family members do not necessarily have to reside in the same household to receive such services.

Economists and courts have also long recognized that an appropriate method in valuing such tangible services is to value their estimated market-based costs by examining costs paid in labor markets that provide generally comparable services for. Thus, economists can value the service by looking at market equivalents from which a pecuniary standard can be established. This approach is set forth in the 1913 U.S.Supreme Court Decision, Michigan Central Railroad Company v. Vreeland, 227 U.S. 59 (1913). So this method is a century old.

The Supreme Court's suggesting in valuing compensable services in the Vreeland decision is a standard that is not rigid, but actually rather general: "[The] pecuniary loss or damage must be one which can be measured by some standard.... Compensation for such loss manifestly does not include damages by way of recompense for grief or wounded feelings." Michigan Central v. Vreeland.

Examples of lost household services that used to be performed by persons (whether fatally or non-fatally injured) can include physical chores such as mowing the lawn, painting the house, cleaning the windows, doing the laundry, washing and repairing the car, preparing the meals and doing the dishes, among others. For many decades economists have met the Supreme Court's general standard by using labor market equivalents for cooks, laundry workers, gardeners, maids, etc. in valuing the physical chores regarding housekeeping services.

Additionally, economists have recognized that tangible services to family members include services well beyond the physical housekeeping chores. For example, William G. Jungbauer and Mark J. Odegard, in Maximizing Recovery in FELA Wrongful Death Actions, in Assessing Family Loss in Wrongful Death Litigation: The Special Roles of Lost Services and Personal Consumption, Lawyers & Judges Publishing Co., 1999, pp. 284, indicate that a complete analysis of all services performed by family members includes much, much more than the physical housekeeping chores. Frank D. Tinari, in a peer-reviewed, scientific, economic journal article "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall

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1998, pp. 253-265, expresses the same view. Dr. Tinari has been a tenured Professor at Seton Hall University, and is a former president of the National Association of Forensic Economics. There has been no peer-reviewed critique of this article since it appeared.

Jungbauer and Odegard indicate that a person may have provided services of many other professions such as that of a chauffeur, driving other family members to appointments, or that of a security guard, especially regarding the injury to a male spouse, etc. Every family member acts as a companion to other family members. And it is common for family members to act as counselors for one another, typically providing advice and counsel on important personal, family, medical, financial, career or other issues. The marketplace can and does value such items of loss. If the person cannot provide these services, or does so at a reduced capacity or rate, there is a distinct and definite loss to the other family members. These losses have a definite and easily measurable pecuniary value. Vreeland requires only that a "reasonable expectation" of loss of services be proven and that such loss be valued by some standard, presumably a reasonably-based economic standard, to allow recovery.

The economic literature on recovery of loss of services discusses an estimated market-oriented valuation cost method to assess the pecuniary value of the loss of accompaniment services, as well as the value of advice, guidance and counsel services that family members provide to one another, within a broadly defined scope of family services. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure, " Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265.

Finally, according to Chief Justice Robert Wilentz of the Supreme Court of New Jersey, in Green v. Bittner, 85 NJ 1, 1980, pp. 12, accompaniment services, to be compensable, must be that which would have provided services substantially equivalent to those provided by the companions often hired today by the aged or infirm, or substantially equivalent to services provided by nurses or practical nurses; and its value must be confined to what the marketplace would pay a stranger with similar qualifications for performing such services.

In valuing the household services that are provided by family members to one another, beyond the physical housekeeping chores, both the U.S Supreme Court and the New Jersey Supreme Court discuss looking at labor markets for the equivalent value of such services. This methodology is identical to the traditional approach that economists have been using for over four decades in valuing the physical chores involved in housekeeping services. 5206

APPENDIX: VALUE OF LIFE

The economic methodology for the valuation of life has been found to meet the _Daubert_ and _Frye_ standards by many courts, along with the Rules of Evidence in many states nationwide. My testimony on the value of life has been accepted in approximately 225 state and federal cases nationwide in approximately two-thirds of the states and two-thirds of the federal jurisdictions. Testimony has been accepted by U.S. district and appellate courts as well as in state circuit, appellate, and supreme courts. The _Daubert_ standard sets forth four criteria:

1. Testing of the theory and science

2. Peer Review

3. Known or potential rate of error

4. Generally accepted.

Testing of the theory and science has been accomplished over the past four decades, since the 1960s. Dozens of economists of high renown have published over a hundred articles in high quality, peer-reviewed economic journals measuring the value of life. The value of life theories are perhaps among the most well-tested in the field of economics, as evidenced by the enormous body of economic scientific literature that has been published in the field and is discussed below.

Peer Review of the concepts and methodology have been extraordinarily extensive. One excellent review of this extensive, peer-reviewed literature can be found in "The Value of Risks to Life and Health," W. K. Viscusi, _Journal of Economic Literature_, Vol. 31, December 1993, pp. 1912-1946. A second is "The Value of a Statistical Life: A Critical Review of Market Estimates throughout the World." W. K. Viscusi and J. E. Aldy, _Journal of Risk and Uncertainty_, Vol. 27, No. 1, November 2002, pp. 5-76. Additional theoretical and empirical work by Viscusi, a leading researcher in the field, can be found in: "The Value of Life", W. K. Viscusi, John M. Olin Center for Law, Economics, and Business, Harvard Law School, Discussion Paper No. 517, June 2005. An additional peer-reviewed article discusses the application to forensic economics: "The Plausible Range for the Value of Life," T. R. Miller, _Journal of Forensic Economics_, Vol. 3, No. 3, Fall 1990, pp. 17-39, which discusses the many dozens of articles published in other peer-reviewed economic journals on this topic. This concept is discussed in detail in "Willingness to Pay Comes of Age: Will the System Survive?" T. R. Miller, _Northwestern University Law Review_, Summer 1989, pp. 876-907, and "Hedonic Damages in Personal Injury and Wrongful Death

Litigation," by Stan V. Smith in Gaughan and Thornton, eds., Litigation Economics, Contemporary Studies in Economic and Financial Analysis, Vol. 74, pp. 39-59, JAI Press, Greenwich, CT, 1993. Kenneth Arrow, a Nobel Laureate in economics, discusses this method for valuing life in "Invaluable Goods," Journal of Economic Literature, Vol. 35, No. 2, 1997, pp. 759. See the Meta-Analyses Appendix for an additional review of the literature.

The known or potential rate of error is well researched. All of these articles discuss the known or potential rate of error, well within the acceptable standard in the field of economics, generally using a 95% confidence rate for the statistical testing and acceptance of results. There are few areas in the field of economics where the known or potential rate of error has been as well-accepted and subject to more extensive investigation.

General Acceptance of the concepts and methodology on the value of life in the field of economics is extensive. This methodology is and has been generally accepted in the field of economics for many years. Indeed, according to the prestigious and highly-regarded research institute, The Rand Corporation, by 1988, the peer-reviewed scientific methods for estimating the value of life were well-accepted: "Most economists would agree that the willingness-to-pay methodology is the most conceptually appropriate criterion for establishing the value of life," Computing Economic loss in Cases of Wrongful Death, King and Smith, Rand Institute for Civil Justice, R-3549-ICJ, 1988.

While first discussed in cutting edge, peer-reviewed economic journals, additional proof of general acceptance is now indicated by the fact that this methodology is now taught in standard economics courses at the undergraduate and graduate level throughout hundreds of colleges and universities nationwide as well as the fact that it is taught and discussed in widely-accepted textbooks in the field of law and economics: Economics, Sixth Edition, David C. Colander, McGraw-Hill Irwin, Boston, 2006, pp. 463-465; this introductory economics textbook is the third most widely used textbook in college courses nationwide. Hamermesh and Rees's The Economics of Work and Pay, Harper-Collins, 1993, Chapter 13, a standard advanced textbook in labor economics, also discusses the methodology for valuing life. Other textbooks discuss this topic as well. Richard Posner, a Judge and former Chief Judge of the U.S. Court of Appeals for the highly regarded 7th Circuit and Senior Lecturer at the University of Chicago Law School, one of most prolific legal writers in America, details the Value of Life approach in his widely used textbooks: Economic Analysis of Law, 1986, Little Brown & Co., pp. 182-185 and Tort Law, 1982, Little Brown & Co., pp. 120-126.

As further evidence of general acceptance in the field, some surveys (albeit non-scientific) published in the field of

forensic economics show that hundreds of economists nationwide are now familiar with this methodology and are available to prepare (and critique) forensic economic value of life estimates. Indeed, some economists who indicate they will prepare such analysis for plaintiffs also are willing to critique such analysis for defendants, as I have done. That an economist is willing to critique a report does not indicate that he or she is opposed to the concept or the methodology, but merely available to assure that the plaintiff economist has employed proper techniques. The fact that there are economists who indicate they do not prepare estimates of value of life is again no indication that they oppose the methodology: many claim they are not familiar with the literature and untrained in this area. While some CPAs and others without a degree in economics have opposed these methods, such professionals do not have the requisite academic training and are unqualified to make such judgements. However, as in any field of economics, this area is not without any dissent. General acceptance does not mean universal acceptance.

Additional evidence of general acceptance in the field is found in the teaching of the concepts regarding the value of life. Forensic Economics is now taught as a special field in a number of institutions nationwide. I taught what is believed to be the first course ever presented in the field of Forensic Economics at DePaul University in Spring, 1990. My own book, <u>Economic/Hedonic Damages</u>, Anderson, 1990, and supplemental updates thereto, co-authored with Dr. Michael Brookshire, a Professor of Economics in West Virginia, has been used as a textbook in at least 5 colleges and universities nationwide in such courses in economics, and has a thorough discussion of the methodology. Toppino et. al., in "Forensic Economics in the Classroom," published in <u>The Earnings Analyst</u>, Journal of the American Rehabilitation Economics Association, Vol. 4, 2001, pp. 53-86, indicate that hedonic damages is one of 15 major topic areas taught in such courses.

Lastly, general acceptance is found by examining publications in the primary journal in the field of Forensic Economics, which is the peer-reviewed <u>Journal of Forensic Economics</u>, where there have been published many articles on the value of life. Some are cited above. Others include: "The Econometric Basis for Estimates of the Value of Life," W. K. Viscusi, Vol 3, No. 3, Fall 1990, pp. 61-70; "Hedonic Damages in the Courtroom Setting." Stan V. Smith, Vol. 3, No. 3, Fall 1990, pp. 41-49; "Issues Affecting the Calculated Value of Life," E. P. Berla, M. L. Brookshire and Stan V. Smith, Vol 3, No. 1, 1990, pp. 1-8; "Hedonic Damages and Personal Injury: A Conceptual Approach." G. R. Albrecht, Vol. 5., No. 2, Spring/Summer 1992, pp. 97-104; "The Application of the Hedonic Damages Concept to Wrongful and Personal Injury Litigation." G. R. Albrecht, Vol. 7, No. 2, Spring/Summer 1994, pp. 143-150; and also "A Review of the Monte Carlo Evidence Concerning Hedonic Value of Life Estimates," R. F.

Gilbert, Vol. 8, No. 2, Spring/Summer 1995, pp. 125-130. Professor Ike Mathur, while Chairman of the Department of Finance at Southern Illinois University wrote an article on how the value of life studies can be used to provide a basis for estimating the value of life per year in application to litigation. This article corroborates my approach: "Estimating Value of Life per Life Year." I. Mathur, Journal of Forensic Economics, Vol. 3, No. 3, 1990, pp. 95-96. As do many of the authors of applications of the value of life literature to litigation economics, Professor Mathur has frequently testified in court, and courts have admitted his testimony.

It is important to note that this methodology is endorsed and employed by the U. S. Government as the standard and recommended approach for use by all U. S. Agencies in valuing life for policy purposes, as mandated in current and past Presidential Executive Orders in effect since 1972, and as discussed in "Report to Congress on the Costs and Benefits of Federal Regulations," Office of Management and Budget, 1998, and "Economic Analysis of Federal Regulations Under Executive Order 12866," Executive Office of the President, Office of Management and Budget, pp. 1-37, and "Report to the President on Executive Order No. 12866," Regulatory Planning and Review, May 1, 1994, Office of Information and Regulatory Affairs, Office of Management and Budget. Prior presidents signed similar orders as discussed in "Federal Agency Valuations of Human life," Administrative Conference of the United States, Report for Recommendation 88-7, December 1988, pp. 368-408. 926

APPENDIX: META-ANALYSES AND VALUE OF LIFE RESULTS SINCE 2000

Below I list the principal systematic reviews (meta-analyses), since the year 2000, of the value of life literature, and the values of a statistical life that they recommend. In statistics, a meta-analysis combines the results of several studies that address a set of related research hypotheses. Meta-analysis increase the statistical power of studies by analyzing a group of studies and provide a more powerful and accurate data analysis than would result from analyzing each study alone. Based on those reviews, the Summary Table suggests a best estimate. The following table summarizes the studies and their findings.

These statistically based studies place the value between $4.4 and $7.5 million, with $5.9 million in year 2005 dollars representing a conservative yet credible estimate of the average (and range midpoint) of the values of a statistical life published in the studies in year 2005 dollars. Net of human capital, a credible net value of life based on all these literature reviews to be $4.8 million in year 2005 dollars, or $5.4 million in year 2008 dollars.

The actual value that I use, $4.1 million in year 2008 dollars ($5.6 million in year 2022 dollars) is approximately 24 percent lower than a conservative average estimate based on the credible meta-analyses. This value was originally based on a review conducted in the late 1980s, averaging the results published by that time. I have increased that late 1980s value only by inflation over time, despite the fact a review of literature over the years since that time has put obvious upward pressure on the figure that I use.

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VALUE OF STATISTICAL LIFE SUMMARY TABLE

Mean and range of value of statistical life estimates (in 2005 dollars) from the best meta-analyses and systematic reviews since 2000 and characteristics of those reviews.

Study	Formal Meta-Analysis?	Number of Values	Best Estimate (2005 Dollars)	Range	Context
Miller 2000	Yes	68 estimates	$5.1M	$4.5-$6.2M	US estimate from all
Mrozek & Taylor 2002	Yes	203 estimates	$4.4M	+ or - 35%	Labor market
Viscusi & Aldy 2003	Yes	49 estimates	$6.5M	$5.1-$9.6M	Labor market, US estimate from all
Kochi et al. 2006	Yes	234 estimates	$6.0M	+ or - 44%	Labor market survey
Bellavance 2006 (published in 2009)	Yes	37 estimates	$7.5M	+ or - 19%	Labor market

Adapted from Ted R. Miller's paper "Hedonic Damages," Journal of Forensic Economics, Vol. 20, No. 2 (October 2008), pp. 137-153.

Miller (2000) started from the Miller 1989 JFE estimates and used statistical methods to adjust for differences between studies. It also added newer studies, primarily ones outside the United States. The authors specified the most appropriate study approach a priori, which allowed calculation of a best estimate from the statistical regression. Miller, Ted R, "Variations between Countries in Values of Statistical Life", <u>Journal of Transport Economics and Policy</u>, Vol. 34, No. 2 (May 2000), pp. 169-188.

Mrozek and Taylor (2002) searched intensively for studies of the value of life implied by wages paid for risky jobs. They coded all values from each study rather than a most appropriate estimate. A statistical analysis identified what factors accounted for the differences in values between studies. The authors specified the most appropriate study approach a priori, which allowed calculation of a best estimate from the statistical regression. Mrozek, Janusz R. and Laura O. Taylor, "What Determines the Value of Life? A Meta-Analysis", <u>Journal of Policy Analysis and Management</u>, Vol. 21, No. 2 (2002), pp. 253-270.

Viscusi and Aldy (2003) focused on values from labor market studies that they considered of high quality and that provided data on risk levels and other important explanatory variables. They used statistical methods to account for variations between studies and derive a best estimate. W.K. Viscusi and J.E. Aldy, "The Value of a Statistical Life: A Critical Review of Market Estimates Throughout the World", <u>Journal of Risk and Uncertainty</u>, Vol. 27, No. 1 (2003), pp. 5-76.

Kochi et al. (2006) searched intensively for studies of the value of life implied by wages and coded all values from each study rather than a most appropriate estimate. They did not filter study quality carefully. The best estimate was derived by statistical methods based on the distribution of the values within and across studies. Kochi, Ikuho, Bryan Hubbell, and Randall Kramer, "An Empirical Bayes Approach to Combining and Comparing Estimates of the Value of a Statistical Life for Environmental Policy Analysis", <u>Environmental and Resource Economics</u>, Vol. 34 (2006), pp. 385-406.

Bellavance et al. (2009) focused on values from labor market studies that they considered of high quality and that provided data on risk levels and other important explanatory variables. They used statistical methods to account for variations between studies and derive a best estimate. Bellavance, Francois, Georges Dionne, and Martin Lebeau, "The Value of a Statistical Life: A Meta-Analysis with a Mixed Effects Regression Model," <u>Journal of Health Economics</u>, Vol. 28, Issue 2, (2009), pp. 444-464. 3A22

SUMMARY OF LOSSES FOR HEATH GARCIA

TABLE	DESCRIPTION	ESTIMATE
*****	******************************	**********

EARNINGS

TABLE	DESCRIPTION	ESTIMATE
	LOSS OF WAGES & BENEFITS	
7	Scenario 1 to age 67	$3,561,595
14	Scenario 2 to age 67	$3,692,314
	OFFSET OF WAGES & BENEFITS	
21	Annual Employment to age 67	($ 878,315)
	NET WAGES & BENEFITS LOSS	
(7-21)	Scenario 1	$2,683,280
(14-21)	Scenario 2	$2,813,999

- -

HOUSEHOLD/FAMILY SERVICES

TABLE	DESCRIPTION	ESTIMATE
24	LOSS OF HOUSEHOLD/FAMILY HOUSEKEEPING AND HOME MANAGEMENT SERVICES	$ 870,494

- -

PRESENT VALUE OF FUTURE LIFE CARE

TABLE	DESCRIPTION	ESTIMATE
	COST OF FUTURE LIFE CARE	
25	See Page 21 of Life Care Plan	$1,176,643

- -

LOSS OF ENJOYMENT OF LIFE

TABLE	DESCRIPTION	ESTIMATE
	REDUCTION IN VALUE OF LIFE	
28	Lower impairment rating	$3,526,460
31	Upper impairment rating	$4,876,236

- -

LOSS OF SOCIETY AND RELATIONSHIP

TABLE	DESCRIPTION	ESTIMATE
	LOSS OF RELATIONSHIP	
34	Valerine Garcia	$3,868,961

The information on this Summary of Losses is intended to summarize losses under certain given assumptions. Please refer to the report and the tables for all the opinions.

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                      Table 1

           LOSS OF PAST WAGES - SCENARIO 1
                    2020 - 2022

         YEAR    AGE     WAGES      CUMULATE
         ****    ***    ********    ********
         2020    39     $85,009     $85,009
         2021    40      86,847     171,856
         2022    41      76,867    $248,723

         HEATH GARCIA $248,723
```

Table 2

LOSS OF PAST EMPLOYEE BENEFITS - SCENARIO 1
2020 - 2022

YEAR	AGE	EMPLOYEE BENEFITS	CUMULATE
****	***	********	********
2020	39	$38,169	$38,169
2021	40	38,994	77,163
2022	41	34,514	$111,677

HEATH GARCIA $111,677

LOSS OF PAST EMPLOYEE BENEFITS - SCENARIO 1

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 3

ECONOMIC LOSS TO DATE - SCENARIO 1
2020 - 2022

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	********	********	********	********
2020	39	$85,009	$38,169	$123,178	$123,178
2021	40	86,847	38,994	125,841	249,019
2022	41	76,867	34,514	111,381	$360,400

HEATH GARCIA	$248,723	$111,677	$360,400

Table 4

PRESENT VALUE OF FUTURE WAGES - SCENARIO 1
2022 - 2062

YEAR	AGE	WAGES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*******	********	**********	**********
2022	41	$15,424	0.99792	$15,392	$15,392
2023	42	92,752	0.98560	91,416	106,808
2024	43	95,547	0.97343	93,008	199,816
2025	44	96,024	0.96141	92,318	292,134
2026	45	97,768	0.94954	92,835	384,969
2027	46	98,257	0.93782	92,147	477,116
2028	47	103,607	0.92624	95,965	573,081
2029	48	104,125	0.91480	95,254	668,335
2030	49	104,646	0.90351	94,549	762,884
2031	50	105,169	0.89236	93,849	856,733
2032	51	92,067	0.88134	81,142	937,875
2033	52	92,988	0.87046	80,942	1,018,817
2034	53	93,918	0.85971	80,742	1,099,559
2035	54	94,857	0.84910	80,543	1,180,102
2036	55	95,806	0.83862	80,345	1,260,447
2037	56	96,764	0.82826	80,146	1,340,593
2038	57	97,732	0.81804	79,949	1,420,542
2039	58	98,709	0.80794	79,751	1,500,293
2040	59	99,696	0.79796	79,553	1,579,846
2041	60	100,693	0.78811	79,357	1,659,203
2042	61	101,700	0.77838	79,161	1,738,364
2043	62	102,717	0.76877	78,966	1,817,330
2044	63	103,744	0.75928	78,771	1,896,101
2045	64	104,781	0.74991	78,576	1,974,677
2046	65	105,829	0.74065	78,382	2,053,059
2047	66	106,887	0.73151	78,189	2,131,248
2048	67	107,956	0.72248	77,996	2,209,244
2049	68	109,036	0.71356	77,804	2,287,048
2050	69	110,126	0.70475	77,611	2,364,659
2051	70	111,227	0.69605	77,420	2,442,079
2052	71	112,339	0.68745	77,227	2,519,306
2053	72	113,462	0.67897	77,037	2,596,343
2054	73	114,597	0.67058	76,846	2,673,189
2055	74	115,743	0.66230	76,657	2,749,846
2056	75	116,900	0.65413	76,468	2,826,314
2057	76	118,069	0.64605	76,278	2,902,592
2058	77	119,250	0.63808	76,091	2,978,683
2059	78	120,443	0.63020	75,903	3,054,586
2060	79	121,647	0.62242	75,716	3,130,302
2061	80	122,863	0.61473	75,528	3,205,830
2062	81	114,232	0.60774	69,423	$3,275,253

HEATH GARCIA $3,275,253

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Table 5

PRESENT VALUE OF FUTURE EMPLOYEE BENEFITS - SCENARIO 1
2022 - 2062

YEAR	AGE	EMPLOYEE BENEFITS	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	********	********	**********	**********
2022	41	$6,925	0.99792	$6,911	$6,911
2023	42	41,646	0.98560	41,046	47,957
2024	43	42,901	0.97343	41,761	89,718
2025	44	43,115	0.96141	41,451	131,169
2026	45	43,898	0.94954	41,683	172,852
2027	46	44,117	0.93782	41,374	214,226
2028	47	46,520	0.92624	43,089	257,315
2029	48	46,752	0.91480	42,769	300,084
2030	49	46,986	0.90351	42,452	342,536
2031	50	47,221	0.89236	42,138	384,674
2032	51	41,338	0.88134	36,433	421,107
2033	52	41,752	0.87046	36,343	457,450
2034	53	42,169	0.85971	36,253	493,703
2035	54	42,591	0.84910	36,164	529,867
2036	55	43,017	0.83862	36,075	565,942
2037	56	43,447	0.82826	35,985	601,927
2038	57	43,882	0.81804	35,897	637,824
2039	58	44,320	0.80794	35,808	673,632
2040	59	44,764	0.79796	35,720	709,352
2041	60	45,211	0.78811	35,631	744,983
2042	61	45,663	0.77838	35,543	780,526
2043	62	46,120	0.76877	35,456	815,982
2044	63	46,581	0.75928	35,368	851,350
2045	64	47,047	0.74991	35,281	886,631
2046	65	47,517	0.74065	35,193	921,824
2047	66	47,992	0.73151	35,107	956,931
2048	67	48,472	0.72248	35,020	991,951
2049	68	48,957	0.71356	34,934	1,026,885
2050	69	49,447	0.70475	34,848	1,061,733
2051	70	49,941	0.69605	34,761	1,096,494
2052	71	50,440	0.68745	34,675	1,131,169
2053	72	50,944	0.67897	34,589	1,165,758
2054	73	51,454	0.67058	34,504	1,200,262
2055	74	51,969	0.66230	34,419	1,234,681
2056	75	52,488	0.65413	34,334	1,269,015
2057	76	53,013	0.64605	34,249	1,303,264
2058	77	53,543	0.63808	34,165	1,337,429
2059	78	54,079	0.63020	34,081	1,371,510
2060	79	54,620	0.62242	33,997	1,405,507
2061	80	55,165	0.61473	33,912	1,439,419
2062	81	51,290	0.60774	31,171	$1,470,590

HEATH GARCIA $1,470,590

Table 6

PRESENT VALUE OF FUTURE WAGES AND BENEFITS - SCENARIO 1
2022 - 2062

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	**********	**********	**********	**********
2022	41	$15,392	$6,911	$22,303	$22,303
2023	42	91,416	41,046	132,462	154,765
2024	43	93,008	41,761	134,769	289,534
2025	44	92,318	41,451	133,769	423,303
2026	45	92,835	41,683	134,518	557,821
2027	46	92,147	41,374	133,521	691,342
2028	47	95,965	43,089	139,054	830,396
2029	48	95,254	42,769	138,023	968,419
2030	49	94,549	42,452	137,001	1,105,420
2031	50	93,849	42,138	135,987	1,241,407
2032	51	81,142	36,433	117,575	1,358,982
2033	52	80,942	36,343	117,285	1,476,267
2034	53	80,742	36,253	116,995	1,593,262
2035	54	80,543	36,164	116,707	1,709,969
2036	55	80,345	36,075	116,420	1,826,389
2037	56	80,146	35,985	116,131	1,942,520
2038	57	79,949	35,897	115,846	2,058,366
2039	58	79,751	35,808	115,559	2,173,925
2040	59	79,553	35,720	115,273	2,289,198
2041	60	79,357	35,631	114,988	2,404,186
2042	61	79,161	35,543	114,704	2,518,890
2043	62	78,966	35,456	114,422	2,633,312
2044	63	78,771	35,368	114,139	2,747,451
2045	64	78,576	35,281	113,857	2,861,308
2046	65	78,382	35,193	113,575	2,974,883
2047	66	78,189	35,107	113,296	3,088,179
2048	67	77,996	35,020	113,016	3,201,195
2049	68	77,804	34,934	112,738	3,313,933
2050	69	77,611	34,848	112,459	3,426,392
2051	70	77,420	34,761	112,181	3,538,573
2052	71	77,227	34,675	111,902	3,650,475
2053	72	77,037	34,589	111,626	3,762,101
2054	73	76,846	34,504	111,350	3,873,451
2055	74	76,657	34,419	111,076	3,984,527
2056	75	76,468	34,334	110,802	4,095,329
2057	76	76,278	34,249	110,527	4,205,856
2058	77	76,091	34,165	110,256	4,316,112
2059	78	75,903	34,081	109,984	4,426,096
2060	79	75,716	33,997	109,713	4,535,809
2061	80	75,528	33,912	109,440	4,645,249
2062	81	69,423	31,171	100,594	$4,745,843

HEATH GARCIA $3,275,253 $1,470,590 $4,745,843

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 7

PRESENT VALUE OF NET WAGES AND BENEFITS - SCENARIO 1
2020 - 2062

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	**********	**********	**********	**********
2020	39	$85,009	$38,169	$123,178	$123,178
2021	40	86,847	38,994	125,841	249,019
2022	41	92,259	41,425	133,684	382,703
2023	42	91,416	41,046	132,462	515,165
2024	43	93,008	41,761	134,769	649,934
2025	44	92,318	41,451	133,769	783,703
2026	45	92,835	41,683	134,518	918,221
2027	46	92,147	41,374	133,521	1,051,742
2028	47	95,965	43,089	139,054	1,190,796
2029	48	95,254	42,769	138,023	1,328,819
2030	49	94,549	42,452	137,001	1,465,820
2031	50	93,849	42,138	135,987	1,601,807
2032	51	81,142	36,433	117,575	1,719,382
2033	52	80,942	36,343	117,285	1,836,667
2034	53	80,742	36,253	116,995	1,953,662
2035	54	80,543	36,164	116,707	2,070,369
2036	55	80,345	36,075	116,420	2,186,789
2037	56	80,146	35,985	116,131	2,302,920
2038	57	79,949	35,897	115,846	2,418,766
2039	58	79,751	35,808	115,559	2,534,325
2040	59	79,553	35,720	115,273	2,649,598
2041	60	79,357	35,631	114,988	2,764,586
2042	61	79,161	35,543	114,704	2,879,290
2043	62	78,966	35,456	114,422	2,993,712
2044	63	78,771	35,368	114,139	3,107,851
2045	64	78,576	35,281	113,857	3,221,708
2046	65	78,382	35,193	113,575	3,335,283
2047	66	78,189	35,107	113,296	3,448,579
2048	67	77,996	35,020	113,016	3,561,595
2049	68	77,804	34,934	112,738	3,674,333
2050	69	77,611	34,848	112,459	3,786,792
2051	70	77,420	34,761	112,181	3,898,973
2052	71	77,227	34,675	111,902	4,010,875
2053	72	77,037	34,589	111,626	4,122,501
2054	73	76,846	34,504	111,350	4,233,851
2055	74	76,657	34,419	111,076	4,344,927
2056	75	76,468	34,334	110,802	4,455,729
2057	76	76,278	34,249	110,527	4,566,256
2058	77	76,091	34,165	110,256	4,676,512
2059	78	75,903	34,081	109,984	4,786,496
2060	79	75,716	33,997	109,713	4,896,209
2061	80	75,528	33,912	109,440	5,005,649
2062	81	69,423	31,171	100,594	$5,106,243

HEATH GARCIA $3,523,976 $1,582,267 $5,106,243

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 8

LOSS OF PAST WAGES - SCENARIO 2
2020 - 2022

YEAR	AGE	WAGES	CUMULATE
****	***	********	********
2020	39	$85,009	$85,009
2021	40	86,847	171,856
2022	41	83,981	$255,837

HEATH GARCIA $255,837

Table 9

LOSS OF PAST EMPLOYEE BENEFITS - SCENARIO 2
2020 - 2022

		EMPLOYEE	
YEAR	AGE	BENEFITS	CUMULATE
****	***	********	********
2020	39	$38,169	$38,169
2021	40	38,994	77,163
2022	41	37,708	$114,871

HEATH GARCIA $114,871

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 10

ECONOMIC LOSS TO DATE - SCENARIO 2
2020 - 2022

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	********	********	********	********
2020	39	$85,009	$38,169	$123,178	$123,178
2021	40	86,847	38,994	125,841	249,019
2022	41	83,981	37,708	121,689	$370,708
HEATH GARCIA		$255,837	$114,871	$370,708	

SMITH ECONOMICS GROUP, LTD. 312/943-1551

Table 11

PRESENT VALUE OF FUTURE WAGES - SCENARIO 2
2022 - 2062

YEAR	AGE	WAGES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*******	********	**********	**********
2022	41	$16,852	0.99792	$16,816	$16,816
2023	42	101,338	0.98560	99,879	116,695
2024	43	105,022	0.97343	102,232	218,927
2025	44	105,547	0.96141	101,474	320,401
2026	45	107,856	0.94954	102,414	422,815
2027	46	108,396	0.93782	101,656	524,471
2028	47	113,363	0.92624	105,001	629,472
2029	48	113,930	0.91480	104,223	733,695
2030	49	114,499	0.90351	103,451	837,146
2031	50	115,072	0.89236	102,686	939,832
2032	51	92,067	0.88134	81,142	1,020,974
2033	52	92,988	0.87046	80,942	1,101,916
2034	53	93,918	0.85971	80,742	1,182,658
2035	54	94,857	0.84910	80,543	1,263,201
2036	55	95,806	0.83862	80,345	1,343,546
2037	56	96,764	0.82826	80,146	1,423,692
2038	57	97,732	0.81804	79,949	1,503,641
2039	58	98,709	0.80794	79,751	1,583,392
2040	59	99,696	0.79796	79,553	1,662,945
2041	60	100,693	0.78811	79,357	1,742,302
2042	61	101,700	0.77838	79,161	1,821,463
2043	62	102,717	0.76877	78,966	1,900,429
2044	63	103,744	0.75928	78,771	1,979,200
2045	64	104,781	0.74991	78,576	2,057,776
2046	65	105,829	0.74065	78,382	2,136,158
2047	66	106,887	0.73151	78,189	2,214,347
2048	67	107,956	0.72248	77,996	2,292,343
2049	68	109,036	0.71356	77,804	2,370,147
2050	69	110,126	0.70475	77,611	2,447,758
2051	70	111,227	0.69605	77,420	2,525,178
2052	71	112,339	0.68745	77,227	2,602,405
2053	72	113,462	0.67897	77,037	2,679,442
2054	73	114,597	0.67058	76,846	2,756,288
2055	74	115,743	0.66230	76,657	2,832,945
2056	75	116,900	0.65413	76,468	2,909,413
2057	76	118,069	0.64605	76,278	2,985,691
2058	77	119,250	0.63808	76,091	3,061,782
2059	78	120,443	0.63020	75,903	3,137,685
2060	79	121,647	0.62242	75,716	3,213,401
2061	80	122,863	0.61473	75,528	3,288,929
2062	81	114,232	0.60774	69,423	$3,358,352

HEATH GARCIA $3,358,352

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                               Table 12

         PRESENT VALUE OF FUTURE EMPLOYEE BENEFITS - SCENARIO 2
                             2022 - 2062

                   EMPLOYEE    DISCOUNT    PRESENT
       YEAR   AGE   BENEFITS    FACTOR      VALUE       CUMULATE
       ****   ***   ********   ********   **********   **********
       2022    41    $7,566    0.99792      $7,551       $7,551
       2023    42    45,501    0.98560      44,846       52,397
       2024    43    47,155    0.97343      45,902       98,299
       2025    44    47,391    0.96141      45,562      143,861
       2026    45    48,427    0.94954      45,983      189,844
       2027    46    48,670    0.93782      45,644      235,488
       2028    47    50,900    0.92624      47,146      282,634
       2029    48    51,155    0.91480      46,797      329,431
       2030    49    51,410    0.90351      46,449      375,880
       2031    50    51,667    0.89236      46,106      421,986
       2032    51    41,338    0.88134      36,433      458,419
       2033    52    41,752    0.87046      36,343      494,762
       2034    53    42,169    0.85971      36,253      531,015
       2035    54    42,591    0.84910      36,164      567,179
       2036    55    43,017    0.83862      36,075      603,254
       2037    56    43,447    0.82826      35,985      639,239
       2038    57    43,882    0.81804      35,897      675,136
       2039    58    44,320    0.80794      35,808      710,944
       2040    59    44,764    0.79796      35,720      746,664
       2041    60    45,211    0.78811      35,631      782,295
       2042    61    45,663    0.77838      35,543      817,838
       2043    62    46,120    0.76877      35,456      853,294
       2044    63    46,581    0.75928      35,368      888,662
       2045    64    47,047    0.74991      35,281      923,943
       2046    65    47,517    0.74065      35,193      959,136
       2047    66    47,992    0.73151      35,107      994,243
       2048    67    48,472    0.72248      35,020    1,029,263
       2049    68    48,957    0.71356      34,934    1,064,197
       2050    69    49,447    0.70475      34,848    1,099,045
       2051    70    49,941    0.69605      34,761    1,133,806
       2052    71    50,440    0.68745      34,675    1,168,481
       2053    72    50,944    0.67897      34,589    1,203,070
       2054    73    51,454    0.67058      34,504    1,237,574
       2055    74    51,969    0.66230      34,419    1,271,993
       2056    75    52,488    0.65413      34,334    1,306,327
       2057    76    53,013    0.64605      34,249    1,340,576
       2058    77    53,543    0.63808      34,165    1,374,741
       2059    78    54,079    0.63020      34,081    1,408,822
       2060    79    54,620    0.62242      33,997    1,442,819
       2061    80    55,165    0.61473      33,912    1,476,731
       2062    81    51,290    0.60774      31,171   $1,507,902

       HEATH GARCIA                       $1,507,902
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Table 13

PRESENT VALUE OF FUTURE WAGES AND BENEFITS - SCENARIO 2
2022 - 2062

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	**********	**********	**********	**********
2022	41	$16,816	$7,551	$24,367	$24,367
2023	42	99,879	44,846	144,725	169,092
2024	43	102,232	45,902	148,134	317,226
2025	44	101,474	45,562	147,036	464,262
2026	45	102,414	45,983	148,397	612,659
2027	46	101,656	45,644	147,300	759,959
2028	47	105,001	47,146	152,147	912,106
2029	48	104,223	46,797	151,020	1,063,126
2030	49	103,451	46,449	149,900	1,213,026
2031	50	102,686	46,106	148,792	1,361,818
2032	51	81,142	36,433	117,575	1,479,393
2033	52	80,942	36,343	117,285	1,596,678
2034	53	80,742	36,253	116,995	1,713,673
2035	54	80,543	36,164	116,707	1,830,380
2036	55	80,345	36,075	116,420	1,946,800
2037	56	80,146	35,985	116,131	2,062,931
2038	57	79,949	35,897	115,846	2,178,777
2039	58	79,751	35,808	115,559	2,294,336
2040	59	79,553	35,720	115,273	2,409,609
2041	60	79,357	35,631	114,988	2,524,597
2042	61	79,161	35,543	114,704	2,639,301
2043	62	78,966	35,456	114,422	2,753,723
2044	63	78,771	35,368	114,139	2,867,862
2045	64	78,576	35,281	113,857	2,981,719
2046	65	78,382	35,193	113,575	3,095,294
2047	66	78,189	35,107	113,296	3,208,590
2048	67	77,996	35,020	113,016	3,321,606
2049	68	77,804	34,934	112,738	3,434,344
2050	69	77,611	34,848	112,459	3,546,803
2051	70	77,420	34,761	112,181	3,658,984
2052	71	77,227	34,675	111,902	3,770,886
2053	72	77,037	34,589	111,626	3,882,512
2054	73	76,846	34,504	111,350	3,993,862
2055	74	76,657	34,419	111,076	4,104,938
2056	75	76,468	34,334	110,802	4,215,740
2057	76	76,278	34,249	110,527	4,326,267
2058	77	76,091	34,165	110,256	4,436,523
2059	78	75,903	34,081	109,984	4,546,507
2060	79	75,716	33,997	109,713	4,656,220
2061	80	75,528	33,912	109,440	4,765,660
2062	81	69,423	31,171	100,594	$4,866,254

HEATH GARCIA $3,358,352 $1,507,902 $4,866,254

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 14

PRESENT VALUE OF NET WAGES AND BENEFITS - SCENARIO 2
2020 - 2062

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	**********	**********	**********	**********
2020	39	$85,009	$38,169	$123,178	$123,178
2021	40	86,847	38,994	125,841	249,019
2022	41	100,797	45,259	146,056	395,075
2023	42	99,879	44,846	144,725	539,800
2024	43	102,232	45,902	148,134	687,934
2025	44	101,474	45,562	147,036	834,970
2026	45	102,414	45,983	148,397	983,367
2027	46	101,656	45,644	147,300	1,130,667
2028	47	105,001	47,146	152,147	1,282,814
2029	48	104,223	46,797	151,020	1,433,834
2030	49	103,451	46,449	149,900	1,583,734
2031	50	102,686	46,106	148,792	1,732,526
2032	51	81,142	36,433	117,575	1,850,101
2033	52	80,942	36,343	117,285	1,967,386
2034	53	80,742	36,253	116,995	2,084,381
2035	54	80,543	36,164	116,707	2,201,088
2036	55	80,345	36,075	116,420	2,317,508
2037	56	80,146	35,985	116,131	2,433,639
2038	57	79,949	35,897	115,846	2,549,485
2039	58	79,751	35,808	115,559	2,665,044
2040	59	79,553	35,720	115,273	2,780,317
2041	60	79,357	35,631	114,988	2,895,305
2042	61	79,161	35,543	114,704	3,010,009
2043	62	78,966	35,456	114,422	3,124,431
2044	63	78,771	35,368	114,139	3,238,570
2045	64	78,576	35,281	113,857	3,352,427
2046	65	78,382	35,193	113,575	3,466,002
2047	66	78,189	35,107	113,296	3,579,298
2048	67	77,996	35,020	113,016	3,692,314
2049	68	77,804	34,934	112,738	3,805,052
2050	69	77,611	34,848	112,459	3,917,511
2051	70	77,420	34,761	112,181	4,029,692
2052	71	77,227	34,675	111,902	4,141,594
2053	72	77,037	34,589	111,626	4,253,220
2054	73	76,846	34,504	111,350	4,364,570
2055	74	76,657	34,419	111,076	4,475,646
2056	75	76,468	34,334	110,802	4,586,448
2057	76	76,278	34,249	110,527	4,696,975
2058	77	76,091	34,165	110,256	4,807,231
2059	78	75,903	34,081	109,984	4,917,215
2060	79	75,716	33,997	109,713	5,026,928
2061	80	75,528	33,912	109,440	5,136,368
2062	81	69,423	31,171	100,594	$5,236,962

HEATH GARCIA $3,614,189 $1,622,773 $5,236,962

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 15

LOSS OF PAST OFFSET WAGES
2020 - 2022

YEAR	AGE	WAGES	CUMULATE
****	***	******	*******
2020	39	$32,142	$32,142
2021	40	0	32,142
2022	41	0	$32,142

HEATH GARCIA $32,142

Table 16

LOSS OF PAST OFFSET EMPLOYEE BENEFITS
2020 - 2022

YEAR	AGE	EMPLOYEE BENEFITS	CUMULATE
****	***	********	********
2020	39	$10,441	$10,441
2021	40	0	10,441
2022	41	0	$10,441

HEATH GARCIA $10,441

Table 17

ECONOMIC OFFSET TO DATE
2020 - 2022

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	*******	********	*******	********
2020	39	$32,142	$10,441	$42,583	$42,583
2021	40	0	0	0	42,583
2022	41	0	0	0	$42,583
HEATH GARCIA		$32,142	$10,441	$42,583	

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                                  Table 18

                    PRESENT VALUE OF FUTURE OFFSET WAGES
                                2022 - 2062

                              DISCOUNT    PRESENT
          YEAR    AGE   WAGES   FACTOR      VALUE      CUMULATE
          ****    ***  ******  ********  **********  **********
          2022    41      $0   0.99792          $0          $0
          2023    42   9,200   0.98560       9,068       9,068
          2024    43  27,867   0.97343      27,127      36,195
          2025    44  28,146   0.96141      27,060      63,255
          2026    45  28,427   0.94954      26,993      90,248
          2027    46  28,711   0.93782      26,926     117,174
          2028    47  28,998   0.92624      26,859     144,033
          2029    48  29,288   0.91480      26,793     170,826
          2030    49  29,581   0.90351      26,727     197,553
          2031    50  29,877   0.89236      26,661     224,214
          2032    51  30,176   0.88134      26,595     250,809
          2033    52  30,478   0.87046      26,530     277,339
          2034    53  30,783   0.85971      26,464     303,803
          2035    54  31,091   0.84910      26,399     330,202
          2036    55  31,402   0.83862      26,334     356,536
          2037    56  31,716   0.82826      26,269     382,805
          2038    57  32,033   0.81804      26,204     409,009
          2039    58  32,353   0.80794      26,139     435,148
          2040    59  32,677   0.79796      26,075     461,223
          2041    60  33,004   0.78811      26,011     487,234
          2042    61  33,334   0.77838      25,947     513,181
          2043    62  33,667   0.76877      25,882     539,063
          2044    63  34,004   0.75928      25,819     564,882
          2045    64  34,344   0.74991      25,755     590,637
          2046    65  34,687   0.74065      25,691     616,328
          2047    66  35,034   0.73151      25,628     641,956
          2048    67  35,384   0.72248      25,564     667,520
          2049    68  35,738   0.71356      25,501     693,021
          2050    69  36,095   0.70475      25,438     718,459
          2051    70  36,456   0.69605      25,375     743,834
          2052    71  36,821   0.68745      25,313     769,147
          2053    72  37,189   0.67897      25,250     794,397
          2054    73  37,561   0.67058      25,188     819,585
          2055    74  37,937   0.66230      25,126     844,711
          2056    75  38,316   0.65413      25,064     869,775
          2057    76  38,699   0.64605      25,001     894,776
          2058    77  39,086   0.63808      24,940     919,716
          2059    78  39,477   0.63020      24,878     944,594
          2060    79  39,872   0.62242      24,817     969,411
          2061    80  40,271   0.61473      24,756     994,167
          2062    81  37,442   0.60774      22,755  $1,016,922

          HEATH GARCIA                         $1,016,922
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                                Table 19

            PRESENT VALUE OF FUTURE OFFSET EMPLOYEE BENEFITS
                             2022 - 2062

                    EMPLOYEE   DISCOUNT   PRESENT
        YEAR   AGE  BENEFITS   FACTOR     VALUE      CUMULATE
        ****   ***  ********   ********   ********   ********
        2022    41        $0   0.99792         $0         $0
        2023    42     2,318   0.98560      2,285      2,285
        2024    43     7,022   0.97343      6,835      9,120
        2025    44     7,093   0.96141      6,819     15,939
        2026    45     7,164   0.94954      6,803     22,742
        2027    46     7,235   0.93782      6,785     29,527
        2028    47     7,307   0.92624      6,768     36,295
        2029    48     7,381   0.91480      6,752     43,047
        2030    49     7,454   0.90351      6,735     49,782
        2031    50     7,529   0.89236      6,719     56,501
        2032    51     7,604   0.88134      6,702     63,203
        2033    52     7,680   0.87046      6,685     69,888
        2034    53     7,757   0.85971      6,669     76,557
        2035    54     7,835   0.84910      6,653     83,210
        2036    55     7,913   0.83862      6,636     89,846
        2037    56     7,992   0.82826      6,619     96,465
        2038    57     8,072   0.81804      6,603    103,068
        2039    58     8,153   0.80794      6,587    109,655
        2040    59     8,235   0.79796      6,571    116,226
        2041    60     8,317   0.78811      6,555    122,781
        2042    61     8,400   0.77838      6,538    129,319
        2043    62     8,484   0.76877      6,522    135,841
        2044    63     8,569   0.75928      6,506    142,347
        2045    64     8,655   0.74991      6,490    148,837
        2046    65     8,741   0.74065      6,474    155,311
        2047    66     8,829   0.73151      6,459    161,770
        2048    67     8,917   0.72248      6,442    168,212
        2049    68     9,006   0.71356      6,426    174,638
        2050    69     9,096   0.70475      6,410    181,048
        2051    70     9,187   0.69605      6,395    187,443
        2052    71     9,279   0.68745      6,379    193,822
        2053    72     9,372   0.67897      6,363    200,185
        2054    73     9,465   0.67058      6,347    206,532
        2055    74     9,560   0.66230      6,332    212,864
        2056    75     9,656   0.65413      6,316    219,180
        2057    76     9,752   0.64605      6,300    225,480
        2058    77     9,850   0.63808      6,285    231,765
        2059    78     9,948   0.63020      6,269    238,034
        2060    79    10,048   0.62242      6,254    244,288
        2061    80    10,148   0.61473      6,238    250,526
        2062    81     9,435   0.60774      5,734   $256,260

        HEATH GARCIA                               $256,260
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SMITH ECONOMICS GROUP, LTD.   312/943-1551

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                                   Table 20

                 PRESENT VALUE OF FUTURE OFFSET WAGES AND BENEFITS
                                 2022 - 2062

                                        EMPLOYEE
        YEAR    AGE      WAGES          BENEFITS        TOTAL         CUMULATE
        ****    ***    **********       ********      **********     **********
        2022    41         $0              $0             $0             $0
        2023    42       9,068           2,285         11,353         11,353
        2024    43      27,127           6,835         33,962         45,315
        2025    44      27,060           6,819         33,879         79,194
        2026    45      26,993           6,803         33,796        112,990
        2027    46      26,926           6,785         33,711        146,701
        2028    47      26,859           6,768         33,627        180,328
        2029    48      26,793           6,752         33,545        213,873
        2030    49      26,727           6,735         33,462        247,335
        2031    50      26,661           6,719         33,380        280,715
        2032    51      26,595           6,702         33,297        314,012
        2033    52      26,530           6,685         33,215        347,227
        2034    53      26,464           6,669         33,133        380,360
        2035    54      26,399           6,653         33,052        413,412
        2036    55      26,334           6,636         32,970        446,382
        2037    56      26,269           6,619         32,888        479,270
        2038    57      26,204           6,603         32,807        512,077
        2039    58      26,139           6,587         32,726        544,803
        2040    59      26,075           6,571         32,646        577,449
        2041    60      26,011           6,555         32,566        610,015
        2042    61      25,947           6,538         32,485        642,500
        2043    62      25,882           6,522         32,404        674,904
        2044    63      25,819           6,506         32,325        707,229
        2045    64      25,755           6,490         32,245        739,474
        2046    65      25,691           6,474         32,165        771,639
        2047    66      25,628           6,459         32,087        803,726
        2048    67      25,564           6,442         32,006        835,732
        2049    68      25,501           6,426         31,927        867,659
        2050    69      25,438           6,410         31,848        899,507
        2051    70      25,375           6,395         31,770        931,277
        2052    71      25,313           6,379         31,692        962,969
        2053    72      25,250           6,363         31,613        994,582
        2054    73      25,188           6,347         31,535      1,026,117
        2055    74      25,126           6,332         31,458      1,057,575
        2056    75      25,064           6,316         31,380      1,088,955
        2057    76      25,001           6,300         31,301      1,120,256
        2058    77      24,940           6,285         31,225      1,151,481
        2059    78      24,878           6,269         31,147      1,182,628
        2060    79      24,817           6,254         31,071      1,213,699
        2061    80      24,756           6,238         30,994      1,244,693
        2062    81      22,755           5,734         28,489     $1,273,182

        HEATH GARCIA $1,016,922      $256,260      $1,273,182
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Table 21

PRESENT VALUE OF NET OFFSET WAGES AND BENEFITS
2020 - 2062

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	TOTAL	CUMULATE
****	***	**********	********	**********	**********
2020	39	$32,142	$10,441	$42,583	$42,583
2021	40	0	0	0	42,583
2022	41	0	0	0	42,583
2023	42	9,068	2,285	11,353	53,936
2024	43	27,127	6,835	33,962	87,898
2025	44	27,060	6,819	33,879	121,777
2026	45	26,993	6,803	33,796	155,573
2027	46	26,926	6,785	33,711	189,284
2028	47	26,859	6,768	33,627	222,911
2029	48	26,793	6,752	33,545	256,456
2030	49	26,727	6,735	33,462	289,918
2031	50	26,661	6,719	33,380	323,298
2032	51	26,595	6,702	33,297	356,595
2033	52	26,530	6,685	33,215	389,810
2034	53	26,464	6,669	33,133	422,943
2035	54	26,399	6,653	33,052	455,995
2036	55	26,334	6,636	32,970	488,965
2037	56	26,269	6,619	32,888	521,853
2038	57	26,204	6,603	32,807	554,660
2039	58	26,139	6,587	32,726	587,386
2040	59	26,075	6,571	32,646	620,032
2041	60	26,011	6,555	32,566	652,598
2042	61	25,947	6,538	32,485	685,083
2043	62	25,882	6,522	32,404	717,487
2044	63	25,819	6,506	32,325	749,812
2045	64	25,755	6,490	32,245	782,057
2046	65	25,691	6,474	32,165	814,222
2047	66	25,628	6,459	32,087	846,309
2048	67	25,564	6,442	32,006	878,315
2049	68	25,501	6,426	31,927	910,242
2050	69	25,438	6,410	31,848	942,090
2051	70	25,375	6,395	31,770	973,860
2052	71	25,313	6,379	31,692	1,005,552
2053	72	25,250	6,363	31,613	1,037,165
2054	73	25,188	6,347	31,535	1,068,700
2055	74	25,126	6,332	31,458	1,100,158
2056	75	25,064	6,316	31,380	1,131,538
2057	76	25,001	6,300	31,301	1,162,839
2058	77	24,940	6,285	31,225	1,194,064
2059	78	24,878	6,269	31,147	1,225,211
2060	79	24,817	6,254	31,071	1,256,282
2061	80	24,756	6,238	30,994	1,287,276
2062	81	22,755	5,734	28,489	$1,315,765

HEATH GARCIA $1,049,064 $266,701 $1,315,765

Table 22

LOSS OF PAST HOUSEHOLD SERVICES
2017 - 2022

YEAR	AGE	HOUSEHOLD SERVICES	CUMULATE
****	***	*********	********
2017	36	$3,601	$3,601
2018	37	12,852	16,453
2019	38	13,749	30,202
2020	39	14,910	45,112
2021	40	15,774	60,886
2022	41	13,926	$74,812

HEATH GARCIA $74,812

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                                   Table 23

                   PRESENT VALUE OF FUTURE HOUSEHOLD SERVICES
                                2022 - 2062

                  HOUSEHOLD    DISCOUNT    PRESENT
       YEAR   AGE  SERVICES    FACTOR       VALUE      CUMULATE
       ****   ***  ********   ********    ********    ********
       2022    41   $2,794    0.99792      $2,788      $2,788
       2023    42   16,887    0.98560      16,644      19,432
       2024    43   17,056    0.97343      16,603      36,035
       2025    44   17,227    0.96141      16,562      52,597
       2026    45   18,562    0.94954      17,625      70,222
       2027    46   18,748    0.93782      17,582      87,804
       2028    47   18,935    0.92624      17,538     105,342
       2029    48   19,124    0.91480      17,495     122,837
       2030    49   19,315    0.90351      17,451     140,288
       2031    50   19,508    0.89236      17,408     157,696
       2032    51   19,703    0.88134      17,365     175,061
       2033    52   19,900    0.87046      17,322     192,383
       2034    53   20,099    0.85971      17,279     209,662
       2035    54   20,300    0.84910      17,237     226,899
       2036    55   21,449    0.83862      17,988     244,887
       2037    56   21,663    0.82826      17,943     262,830
       2038    57   21,880    0.81804      17,899     280,729
       2039    58   22,099    0.80794      17,855     298,584
       2040    59   22,320    0.79796      17,810     316,394
       2041    60   22,543    0.78811      17,766     334,160
       2042    61   22,768    0.77838      17,722     351,882
       2043    62   22,996    0.76877      17,679     369,561
       2044    63   23,226    0.75928      17,635     387,196
       2045    64   23,458    0.74991      17,591     404,787
       2046    65   23,693    0.74065      17,548     422,335
       2047    66   23,930    0.73151      17,505     439,840
       2048    67   36,238    0.72248      26,181     466,021
       2049    68   36,600    0.71356      26,116     492,137
       2050    69   36,966    0.70475      26,052     518,189
       2051    70   37,336    0.69605      25,988     544,177
       2052    71   37,709    0.68745      25,923     570,100
       2053    72   38,086    0.67897      25,859     595,959
       2054    73   38,467    0.67058      25,795     621,754
       2055    74   38,852    0.66230      25,732     647,486
       2056    75   32,973    0.65413      21,569     669,055
       2057    76   33,303    0.64605      21,515     690,570
       2058    77   33,636    0.63808      21,462     712,032
       2059    78   33,972    0.63020      21,409     733,441
       2060    79   34,312    0.62242      21,356     754,797
       2061    80   34,655    0.61473      21,303     776,100
       2062    81   32,221    0.60774      19,582    $795,682

       HEATH GARCIA                                  $795,682



           SMITH ECONOMICS GROUP, LTD.   312/943-1551
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Table 24

PRESENT VALUE OF NET HOUSEHOLD SERVICES
2017 - 2062

YEAR	AGE	HOUSEHOLD SERVICES	CUMULATE
****	***	********	*******
2017	36	$3,601	$3,601
2018	37	12,852	16,453
2019	38	13,749	30,202
2020	39	14,910	45,112
2021	40	15,774	60,886
2022	41	16,714	77,600
2023	42	16,644	94,244
2024	43	16,603	110,847
2025	44	16,562	127,409
2026	45	17,625	145,034
2027	46	17,582	162,616
2028	47	17,538	180,154
2029	48	17,495	197,649
2030	49	17,451	215,100
2031	50	17,408	232,508
2032	51	17,365	249,873
2033	52	17,322	267,195
2034	53	17,279	284,474
2035	54	17,237	301,711
2036	55	17,988	319,699
2037	56	17,943	337,642
2038	57	17,899	355,541
2039	58	17,855	373,396
2040	59	17,810	391,206
2041	60	17,766	408,972
2042	61	17,722	426,694
2043	62	17,679	444,373
2044	63	17,635	462,008
2045	64	17,591	479,599
2046	65	17,548	497,147
2047	66	17,505	514,652
2048	67	26,181	540,833
2049	68	26,116	566,949
2050	69	26,052	593,001
2051	70	25,988	618,989
2052	71	25,923	644,912
2053	72	25,859	670,771
2054	73	25,795	696,566
2055	74	25,732	722,298
2056	75	21,569	743,867
2057	76	21,515	765,382
2058	77	21,462	786,844
2059	78	21,409	808,253
2060	79	21,356	829,609
2061	80	21,303	850,912
2062	81	19,582	$870,494

HEATH GARCIA $870,494

TABLE 25

LIFE CARE PLAN CALCULATION		MEDICAL SERVICES		(MS = MED SERVICES)	1.50%
				(MC = MED COMMODITIES)	0.25%
NAME:	Heath Garcia	ADOT:	41.1	(NMS = NON-MED SVCS)	1.00%
DOI :	09/17/17	RLEDOT:	40.1	(NON-MC = NON-MED COMM)	0.00%
DOT:	11/01/22	LEDOT:	81.2	(D = DISCOUNT RATE)	1.25%
# OF DAYS FROM DOT TO EOY =	60				
FIRST YEAR FRACTION	0.1644				
END OF LE =	12/07/62				
# OF DAYS IN LAST YEAR	341				
LAST YEAR FRACTION	0.9329				

ITEM	COST PER UNIT	# OF UNITS USED	per	# OF YEARS	# OF UNITS PER YEAR	ANNUAL COST	INITIAL YEAR OF COST	LAST YEAR OF COST
Orthopedic Eval, Monitoring, and Treatment	$467	1		1	1.00	$467	2022	2062
Podiatry Eval, Monitoring, and Treatment	$467	1		1	1.00	$467	2022	2062
Psychiatric Eval.	$350	1		1	1.00	$350	2022	2022
Psychiatric Monitoring and Treatment	$250	12		1	12.00	$3,000	2022	2062
Future Flap Revision Surgery	$10,935	1		40	0.03	$273	2022	2062
Hammertoe Correction Surgery	$16,909	1		3	0.33	$5,636	2023	2025
Hardware Removal	$21,654	1		1	1.00	$21,654	2022	2022
Ankle Arthrodesis OR Replacement	$99,315	1		5	0.20	$19,863	2023	2027

TABLE 25

ITEM														
TRIAL YEAR													
AGE: 41	42	43	44	45	46	47	48	49	50	51	52	53	54
2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Orthopedic Eval., Monitoring, and Treatment $77	$467	$468	$470	$471	$472	$473	$474	$475	$477	$478	$479	$480	$481
Podiatry Eval., Monitoring, and Treatment $77	$467	$468	$470	$471	$472	$473	$474	$475	$477	$478	$479	$480	$481
Psychiatric Eval. $350													
Psychiatric Monitoring and Treatment $492	$3,001	$3,009	$3,016	$3,024	$3,031	$3,039	$3,046	$3,054	$3,061	$3,069	$3,076	$3,084	$3,091
Future Flap Revision Surgery $273	$273	$274	$275	$276	$276	$277	$278	$278	$279	$280	$280	$281	$282
Hammertoe Correction Surgery	$5,639	$5,653	$5,667										
Hardware Removal $21,654													
Ankle Arthrodesis OR Replacement	$19,871	$19,920	$19,970	$20,019	$20,068								
ANNUAL PRESENT VALUE $22,922	$29,719	$29,793	$29,866	$24,259	$24,319	$4,261	$4,272	$4,282	$4,293	$4,304	$4,314	$4,325	$4,336
CUMULATIVE TOTAL $22,922	$52,641	$82,433	$112,300	$136,559	$160,878	$165,140	$169,411	$173,694	$177,987	$182,291	$186,605	$190,930	$195,265

TABLE 25

AGE:	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69
ITEM	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050
Orthopedic Eval., Monitoring, and Treatment	$482	$484	$485	$486	$487	$488	$490	$491	$492	$493	$494	$496	$497	$498	$499
Podiatry Eval., Monitoring, and Treatment	$482	$484	$485	$486	$487	$488	$490	$491	$492	$493	$494	$496	$497	$498	$499
Psychiatric Eval.															
Psychiatric Monitoring and Treatment	$3,099	$3,107	$3,114	$3,122	$3,130	$3,137	$3,145	$3,153	$3,161	$3,169	$3,176	$3,184	$3,192	$3,200	$3,208
Future Flap Revision Surgery	$282	$283	$284	$285	$285	$286	$287	$287	$288	$289	$289	$290	$291	$292	$292
Hammertoe Correction Surgery															
Hardware Removal															
Ankle Arthrodesis OR Replacement															
ANNUAL PRESENT VALUE	$4,346	$4,357	$4,368	$4,379	$4,389	$4,400	$4,411	$4,422	$4,433	$4,444	$4,455	$4,466	$4,477	$4,488	$4,499
CUMULATIVE TOTAL	$199,612	$203,969	$208,336	$212,715	$217,104	$221,505	$225,916	$230,338	$234,771	$239,214	$243,669	$248,135	$252,612	$257,100	$261,599

TABLE 25

ITEM / AGE:	70	71	72	73	74	75	76	77	78	79	80	81	TOTALS
	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	
Orthopedic Eval., Monitoring, and Treatment	$501	$502	$503	$504	$506	$507	$508	$509	$511	$512	$513	$480	$19,659
Podiatry Eval., Monitoring, and Treatment	$501	$502	$503	$504	$506	$507	$508	$509	$511	$512	$513	$480	$19,659
Psychiatric Eval.													$350
Psychiatric Monitoring and Treatment	$3,216	$3,224	$3,232	$3,240	$3,248	$3,256	$3,264	$3,272	$3,280	$3,288	$3,296	$3,083	$126,287
Future Flap Revision Surgery	$293	$294	$294	$295	$296	$297	$297	$298	$299	$300	$300	$281	$11,736
Hammertoe Correction Surgery													$16,958
Hardware Removal													$21,654
Ankle Arthrodesis OR Replacement													$99,849
ANNUAL PRESENT VALUE	$4,510	$4,521	$4,532	$4,544	$4,555	$4,566	$4,577	$4,589	$4,600	$4,611	$4,623	$4,323	
CUMULATIVE TOTAL	$266,109	$270,630	$275,162	$279,706	$284,261	$288,827	$293,404	$297,993	$302,593	$307,204	$311,827	$316,150	$316,150

TABLE 25

LIFE CARE PLAN CALCULATION			MEDICAL COMMODITIES						(MS = MED SERVICES)			1.50%
									(MC = MED COMMODITIES)			0.25%
NAME:	Heath Garcia	ADOT:	41.1						(NMS = NON-MED SVCS)			1.00%
DOI :	09/17/17	RLEDOT:	40.1						(NON-MC = NON-MED COMM)			0.00%
DOT:	11/01/22	LEDOT:	81.2						(D = DISCOUNT RATE)			1.25%
# OF DAYS FROM DOT TO EOY =	60											
FIRST YEAR FRACTION	0.1644											
END OF LE =	12/07/62											
# OF DAYS IN LAST YEAR	341											
LAST YEAR FRACTION	0.9329											
											INITIAL YEAR	LAST YEAR
			ITEM	COST PER UNIT	# OF UNITS USED	per	# OF YEARS	# OF UNITS PER YEAR	ANNUAL COST		OF COST	OF COST
			ExoSym Brace	$10,704	1		5	0.20	$2,141		2022	2062
			Duloxetine 90 mg daily	$580	12		1	12.00	$6,960		2022	2062
			Hydroxyzine 25 mg every 6 hours	$66	12		1	12.00	$792		2022	2062
			Mirtazapine 15 mg daily	$56	12		1	12.00	$672		2022	2062
			Gabepentin 100 mg daily	$17	12		1	12.00	$204		2022	2062

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

MED COMM

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TABLE 25

	TRIAL YEAR														
AGE:	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55
ITEM	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
ExoSym Brace	$351	$2,115	$2,094	$2,074	$2,053	$2,033	$2,013	$1,993	$1,973	$1,954	$1,935	$1,915	$1,897	$1,878	$1,859
Duloxetine 90 mg daily	$1,142	$6,877	$6,809	$6,742	$6,675	$6,609	$6,544	$6,479	$6,415	$6,352	$6,289	$6,227	$6,166	$6,105	$6,045
Hydroxyzine 25 mg every 6 hours	$130	$782	$775	$767	$760	$752	$745	$737	$730	$723	$716	$709	$702	$695	$688
Mirtazapine 15 mg daily	$110	$664	$657	$651	$644	$638	$632	$626	$619	$613	$607	$601	$595	$589	$584
Gabapentin 100 mg daily	$33	$201	$199	$197	$196	$194	$192	$190	$188	$186	$184	$182	$181	$179	$177
ANNUAL PRESENT VALUE	$1,767	$10,640	$10,535	$10,431	$10,328	$10,226	$10,125	$10,025	$9,926	$9,828	$9,731	$9,635	$9,540	$9,445	$9,352
CUMULATIVE TOTAL	$1,767	$12,407	$22,942	$33,373	$43,701	$53,927	$64,052	$74,077	$84,003	$93,831	$103,562	$113,197	$122,737	$132,182	$141,534

TABLE 25

ITEM	AGE: 56	57	58	59	60	61	62	63	64	65	66	67	68	69
	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050
ExoSym Brace	$1,841	$1,823	$1,805	$1,787	$1,769	$1,752	$1,734	$1,717	$1,700	$1,684	$1,667	$1,650	$1,634	$1,618
Duloxetine 90 mg daily	$5,985	$5,926	$5,867	$5,809	$5,752	$5,695	$5,639	$5,583	$5,528	$5,473	$5,419	$5,366	$5,313	$5,260
Hydroxyzine 25 mg every 6 hours	$681	$674	$668	$661	$654	$648	$642	$635	$629	$623	$617	$611	$604	$599
Mirtazapine 15 mg daily	$578	$572	$566	$561	$555	$550	$544	$539	$534	$528	$523	$518	$513	$508
Gabepentin 100 mg daily	$175	$174	$172	$170	$168	$167	$165	$164	$162	$160	$159	$157	$156	$154
ANNUAL PRESENT VALUE	$9,260	$9,168	$9,078	$8,988	$8,899	$8,811	$8,724	$8,638	$8,553	$8,468	$8,385	$8,302	$8,220	$8,139
CUMULATIVE TOTAL	$150,794	$159,962	$169,040	$178,028	$186,928	$195,739	$204,464	$213,102	$221,655	$230,123	$238,508	$246,810	$255,030	$263,169

MED COMM

TABLE 25

AGE:	70	71	72	73	74	75	76	77	78	79	80	81	TOTALS
ITEM	**2051**	**2052**	**2053**	**2054**	**2055**	**2056**	**2057**	**2058**	**2059**	**2060**	**2061**	**2062**	
ExoSym Brace	$1,602	$1,586	$1,571	$1,555	$1,540	$1,524	$1,509	$1,495	$1,480	$1,465	$1,451	$1,340	$70,437
Duloxetine 90 mg daily	$5,208	$5,157	$5,106	$5,056	$5,006	$4,956	$4,907	$4,859	$4,811	$4,763	$4,716	$4,357	$228,996
Hydroxyzine 25 mg every 6 hours	$593	$587	$581	$575	$570	$564	$558	$553	$547	$542	$537	$496	$26,055
Mirtazapine 15 mg daily	$503	$498	$493	$488	$483	$478	$474	$469	$464	$460	$455	$421	$22,106
Gabapentin 100 mg daily	$153	$151	$150	$148	$147	$145	$144	$142	$141	$140	$138	$128	$6,708
ANNUAL PRESENT VALUE	$8,058	$7,979	$7,900	$7,822	$7,745	$7,668	$7,593	$7,518	$7,443	$7,370	$7,297	$6,740	$354,302
CUMULATIVE TOTAL	$271,227	$279,206	$287,106	$294,928	$302,673	$310,342	$317,934	$325,452	$332,895	$340,265	$347,562	$354,302	

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

LIFE CARE PLAN CALCULATION		NON-MEDICAL SERVICES			(MS = MED SERVICES)	1.50%
					(MC = MED COMMODITIES)	0.25%
NAME:	Heath Garcia	ADOT:	41.1		(NMS = NON-MED SVCS)	1.00%
DOI :	9/17/2017	RLEDOT:	40.1		(NON-MC = NON-MED COMM)	0.00%
DOT:	11/1/2022	LEDOT:	81.2		(D = DISCOUNT RATE)	1.25%
# OF DAYS FROM DOT TO EOY =	60					
FIRST YEAR FRACTION	0.1644					
END OF LE =	12/07/62					
# OF DAYS IN LAST YEAR	341					
LAST YEAR FRACTION	0.9329					

ITEM	COST PER UNIT	# OF UNITS USED	per	# OF YEARS	# OF UNITS PER YEAR	ANNUAL COST	INITIAL YEAR OF COST	LAST YEAR OF COST
Physical Medicine and Rehab Eval...	$467	1		2	0.50	$234	2022	2062
Neuropsychological Evaluation	$3,025	1		1	1.00	$3,025	2022	2022
Individual Counseling, Eval., Monitor...	$143	52		1	52.00	$7,436	2022	2062
Couples Counseling, Eval, Montor, & Treatment	$158	15		40	0.38	$59	2022	2062
Family Counseling, Eval, Montor, & Treatment	$150	15		40	0.38	$56	2022	2062
Physical Therapy Evaluation, Monito, & Treat. (Eval)	$250	2		2	1.00	$250	2022	2023
Physical Therapy Evaluation, Monito, & Treatment	$177	16		40	0.40	$71	2022	2062
Cognitive Rehabilitation Therapy (Eval)	$301	1		1	1.00	$301	2022	2022
Cognitive Rehabilitation Therapy	$258	6		1	6.00	$1,548	2023	2023
Maintenance ExoSym	$750	1		1	1.00	$750	2022	2062
Household Chore Services	$27	48		1	48.00	$1,296	2022	2062
Yard Work and Home Repair	$52	48		1	48.00	$2,496	2022	2062

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

NON-MED SVCS

TABLE 25

ITEM	TRIAL YEAR												
AGE:	41	42	43	44	45	46	47	48	49	50	51	52	53
	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Physical Medicine and Rehab Eval...	$38	$232	$232	$231	$231	$230	$230	$229	$228	$228	$227	$227	$226
Neuropsychological Evaluation	$3,025												
Individual Counseling, Eval., Monitor....	$1,220	$7,403	$7,384	$7,366	$7,348	$7,330	$7,312	$7,294	$7,276	$7,258	$7,240	$7,222	$7,204
Couples Counseling, Eval, Montor, & Treatment	$10	$59	$59	$59	$59	$58	$58	$58	$58	$58	$58	$58	$57
Family Counseling, Eval, Montor, & Treatment	$9	$56	$56	$56	$56	$55	$55	$55	$55	$55	$55	$55	$54
Physical Therapy Evaluation, Monito, & Treat. (Eval)	$250	$249											
Physical Therapy Evaluation, Monito, & Treatment	$12	$70	$70	$70	$70	$70	$70	$69	$69	$69	$69	$69	$69
Cognitive Rehabilitation Therapy (Eval)	$301	$1,541											
Cognitive Rehabilitation Therapy													
Maintenance ExoSym	$123	$747	$745	$743	$741	$739	$737	$736	$734	$732	$730	$728	$727
Household Chore Services	$213	$1,290	$1,287	$1,284	$1,281	$1,277	$1,274	$1,271	$1,268	$1,265	$1,262	$1,259	$1,256
Yard Work and Home Repair	$409	$2,485	$2,479	$2,473	$2,466	$2,460	$2,454	$2,448	$2,442	$2,436	$2,430	$2,424	$2,418
ANNUAL PRESENT VALUE	$5,610	$14,132	$12,311	$12,281	$12,251	$12,221	$12,190	$12,160	$12,130	$12,100	$12,070	$12,041	$12,011
CUMULATIVE TOTAL	$5,610	$19,742	$32,053	$44,334	$56,585	$68,806	$80,996	$93,156	$105,286	$117,387	$129,457	$141,498	$153,508

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

ITEM / AGE:	54	55	56	57	58	59	60	61	62	63	64	65	66
	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047
Physical Medicine and Rehab Eval...	$226	$225	$225	$224	$223	$223	$222	$222	$221	$221	$220	$220	$219
Neuropsychological Evaluation													
Individual Counseling, Eval., Monitor...	$7,186	$7,168	$7,151	$7,133	$7,115	$7,098	$7,080	$7,063	$7,045	$7,028	$7,011	$6,993	$6,976
Couples Counseling, Eval, Montor, & Treatment	$57	$57	$57	$57	$57	$57	$56	$56	$56	$56	$56	$56	$56
Family Counseling, Eval, Montor, & Treatment	$54	$54	$54	$54	$54	$54	$54	$53	$53	$53	$53	$53	$53
Physical Therapy Evaluation, Monito, & Treat. (Eval)													
Physical Therapy Evaluation, Monito, & Treatment	$68	$68	$68	$68	$68	$68	$67	$67	$67	$67	$67	$67	$66
Cognitive Rehabilitation Therapy (Eval)													
Cognitive Rehabilitation Therapy													
Maintenance ExoSym	$725	$723	$721	$719	$718	$716	$714	$712	$711	$709	$707	$705	$704
Household Chore Services	$1,252	$1,249	$1,246	$1,243	$1,240	$1,237	$1,234	$1,231	$1,228	$1,225	$1,222	$1,219	$1,216
Yard Work and Home Repair	$2,412	$2,406	$2,400	$2,394	$2,388	$2,382	$2,377	$2,371	$2,365	$2,359	$2,353	$2,347	$2,342
ANNUAL PRESENT VALUE	$11,981	$11,952	$11,922	$11,893	$11,863	$11,834	$11,805	$11,776	$11,747	$11,718	$11,689	$11,660	$11,631
CUMULATIVE TOTAL	$165,490	$177,441	$189,363	$201,256	$213,119	$224,953	$236,758	$248,534	$260,280	$271,998	$283,687	$295,346	$306,977

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

NON-MED SVCS

TABLE 25

ITEM	AGE:	67	68	69	70	71	72	73	74	75	76	77	78	79	80
Physical Medicine and Rehab Eval....		2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061
		$219	$218	$217	$217	$216	$216	$215	$215	$214	$214	$213	$213	$212	$212
Neuropsychological Evaluation															
Individual Counseling, Eval., Monitor....		$6,959	$6,942	$6,925	$6,907	$6,890	$6,873	$6,856	$6,839	$6,823	$6,806	$6,789	$6,772	$6,755	$6,739
Couples Counseling, Eval, Montor, & Treatment		$55	$55	$55	$55	$55	$55	$55	$54	$54	$54	$54	$54	$54	$54
Family Counseling, Eval, Montor, & Treatment		$53	$53	$52	$52	$52	$52	$52	$52	$52	$51	$51	$51	$51	$51
Physical Therapy Evaluation, Monito, & Treat. (Eval)															
Physical Therapy Evaluation, Monito, & Treatment		$66	$66	$66	$66	$66	$65	$65	$65	$65	$65	$65	$64	$64	$64
Cognitive Rehabilitation Therapy (Eval)															
Cognitive Rehabilitation Therapy															
Maintenance ExoSym		$702	$700	$698	$697	$695	$693	$692	$690	$688	$686	$685	$683	$681	$680
Household Chore Services		$1,213	$1,210	$1,207	$1,204	$1,201	$1,198	$1,195	$1,192	$1,189	$1,186	$1,183	$1,180	$1,177	$1,174
Yard Work and Home Repair		$2,336	$2,330	$2,324	$2,319	$2,313	$2,307	$2,301	$2,296	$2,290	$2,284	$2,279	$2,273	$2,268	$2,262
ANNUAL PRESENT VALUE		$11,602	$11,574	$11,545	$11,517	$11,488	$11,460	$11,431	$11,403	$11,375	$11,347	$11,319	$11,291	$11,263	$11,235
CUMULATIVE TOTAL		$318,580	$330,153	$341,698	$353,215	$364,703	$376,163	$387,594	$398,997	$410,372	$421,719	$433,038	$444,329	$455,592	$466,828

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

ITEM	AGE: 81	TOTALS
	2062	
Physical Medicine and Rehab Eval...	$197	$8,888
Neuropsychological Evaluation		$3,025
Individual Counseling, Eval., Monitor....	$6,271	$283,049
Couples Counseling, Eval, Montor, & Treatment	$50	$2,255
Family Counseling, Eval, Montor, & Treatment	$47	$2,141
Physical Therapy Evaluation, Monito, & Treat. (Eval)		$499
Physical Therapy Evaluation, Monito, & Treatment	$60	$2,695
Cognitive Rehabilitation Therapy (Eval)		$301
Cognitive Rehabilitation Therapy		$1,541
Maintenance ExoSym	$633	$28,548
Household Chore Services	$1,093	$49,332
Yard Work and Home Repair	$2,105	$95,009
ANNUAL PRESENT VALUE	$10,456	$477,284
CUMULATIVE TOTAL	$477,284	

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

LIFE CARE PLAN CALCULATION		NON-MEDICAL COMMODITIES				(MS = MED SERVICES)	1.50%
						(MC = MED COMMODITIES)	0.25%
NAME:	Heath Garcia	ADOT:	41.1			(NMS = NON-MED SVCS)	1.00%
DOI:	9/17/2017	RLEDOT:	40.1			(NON-MC = NON-MED COMM)	0.00%
DOT:	11/1/2022	LEDOT:	81.2			(D = DISCOUNT RATE)	1.25%
# OF DAYS FROM DOT TO EOY =	60						
FIRST YEAR FRACTION	0.1644						
END OF LE =	12/07/62						
# OF DAYS IN LAST YEAR	341						
LAST YEAR FRACTION	0.9329						

ITEM	COST PER UNIT	# OF UNITS USED	per	# OF YEARS	# OF UNITS PER YEAR	ANNUAL COST	INITIAL YEAR OF COST	LAST YEAR OF COST
Specialty Shoes	$600	2		1	1.50	$900	2022	2062
Cane	$30	1		2	0.50	$15	2022	2062
Knee Scooter	$189	1		1	1.00	$189	2022	2022

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

	TRIAL YEAR														
AGE:	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55
ITEM	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
Specialty Shoes	$148	$887	$876	$865	$855	$844	$834	$823	$813	$803	$793	$783	$774	$764	$755
Cane	$2	$15	$15	$14	$14	$14	$14	$14	$14	$13	$13	$13	$13	$13	$13
Knee Scooter	$189														
ANNUAL PRESENT VALUE	$340	$902	$891	$880	$869	$858	$848	$837	$827	$817	$806	$796	$787	$777	$767
CUMULATIVE TOTAL	$340	$1,241	$2,132	$3,012	$3,881	$4,739	$5,586	$6,423	$7,250	$8,067	$8,873	$9,670	$10,456	$11,233	$12,001

TABLE 25

AGE:	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71
ITEM	**2037**	**2038**	**2039**	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**	**2046**	**2047**	**2048**	**2049**	**2050**	**2051**	**2052**
Specialty Shoes	$745	$736	$727	$718	$709	$701	$692	$683	$675	$667	$658	$650	$642	$634	$626	$619
Cane	$12	$12	$12	$12	$12	$12	$12	$11	$11	$11	$11	$11	$11	$11	$10	$10
Knee Scooter																
ANNUAL PRESENT VALUE	$758	$749	$739	$730	$721	$712	$703	$695	$686	$678	$669	$661	$653	$645	$637	$629
CUMULATIVE TOTAL	$12,759	$13,507	$14,246	$14,976	$15,698	$16,410	$17,113	$17,808	$18,494	$19,172	$19,841	$20,502	$21,155	$21,800	$22,437	$23,066

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

ITEM	AGE:	72	73	74	75	76	77	78	79	80	81	TOTALS
Specialty Shoes		2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	
		$611	$604	$596	$589	$581	$574	$567	$560	$553	$510	$28,248
Cane		$10	$10	$10	$10	$10	$10	$9	$9	$9	$8	$470
Knee Scooter												$189
ANNUAL PRESENT VALUE		$621	$614	$606	$599	$591	$584	$577	$570	$562	$518	$28,908
CUMULATIVE TOTAL		$23,687	$24,301	$24,907	$25,506	$26,097	$26,681	$27,257	$27,827	$28,389	$28,908	

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TABLE 25

LIFE CARE PLAN CALCULATION			TOTAL	(MS = MED SERVICES)	1.50%	1.01500
				(MC = MED COMMODITIES)	0.25%	1.0025
NAME:	Heath Garcia	ADOT:	41.1	(NMS = NON-MED SVCS)	1.00%	1.01
DOI:	09/17/17	RLEDOT:	40.1	(NON-MC = NON-MED COMM)	0.00%	1.00
DOT:	11/01/22	LEDOT:	81.2	(D = DISCOUNT RATE)	1.25%	1.0125
# OF DAYS FROM DOT TO EOY =	60					
FIRST YEAR FRACTION	0.1644					
END OF LE =	12/07/62					
# OF DAYS IN LAST YEAR	341					
LAST YEAR FRACTION	0.9329					

	COST PROJECTIONS	TRIAL YEAR		
	AGE:	41	42	43
CUMULATIVE TOTALS		2022	2023	2024
MEDICAL SERVICES		$22,922	$52,641	$82,433
MEDICAL COMMODITIES		$1,767	$12,407	$22,942
NON MED SERVICES		$5,610	$19,742	$32,053
NON MED COMMODITIES		$340	$1,241	$2,132
GRAND TOTAL		$30,638	$86,031	$139,561

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TOTAL

TABLE 25

COST PROJECTIONS														
AGE:	44	45	46	47	48	49	50	51	52	53	54	55	56	57
CUMULATIVE TOTALS	_2025_	_2026_	_2027_	_2028_	_2029_	_2030_	_2031_	_2032_	_2033_	_2034_	_2035_	_2036_	_2037_	_2038_
MEDICAL SERVICES	$112,300	$136,559	$160,878	$165,140	$169,411	$173,694	$177,987	$182,291	$186,605	$190,930	$195,265	$199,612	$203,969	$208,336
MEDICAL COMMODITIES	$33,373	$43,701	$53,927	$64,052	$74,077	$84,003	$93,831	$103,562	$113,197	$122,737	$132,182	$141,534	$150,794	$159,962
NON MED SERVICES	$44,334	$56,585	$68,806	$80,996	$93,156	$105,286	$117,387	$129,457	$141,498	$153,508	$165,490	$177,441	$189,363	$201,256
NON MED COMMODITIES	$3,012	$3,881	$4,739	$5,586	$6,423	$7,250	$8,067	$8,873	$9,670	$10,456	$11,233	$12,001	$12,759	$13,507
GRAND TOTAL	$193,019	$240,726	$288,350	$315,774	$343,068	$370,234	$397,271	$424,183	$450,969	$477,631	$504,170	$530,588	$556,885	$583,062

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TOTAL

TABLE 25

COST PROJECTIONS														
AGE:	58	59	60	61	62	63	64	65	66	67	68	69	70	71
CUMULATIVE TOTALS	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052
MEDICAL SERVICES	$212,715	$217,104	$221,505	$225,916	$230,338	$234,771	$239,214	$243,669	$248,135	$252,612	$257,100	$261,599	$266,109	$270,630
MEDICAL COMMODITIES	$169,040	$178,028	$186,928	$195,739	$204,464	$213,102	$221,655	$230,123	$238,508	$246,810	$255,030	$263,169	$271,227	$279,206
NON MED SERVICES	$213,119	$224,953	$236,758	$248,534	$260,280	$271,998	$283,687	$295,346	$306,977	$318,580	$330,153	$341,698	$353,215	$364,703
NON MED COMMODITIES	$14,246	$14,976	$15,698	$16,410	$17,113	$17,808	$18,494	$19,172	$19,841	$20,502	$21,155	$21,800	$22,437	$23,066
GRAND TOTAL	$609,121	$635,062	$660,888	$686,598	$712,195	$737,678	$763,050	$788,311	$813,462	$838,504	$863,438	$888,266	$912,988	$937,605

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TOTAL

TABLE 25

COST PROJECTIONS										
AGE:	72	73	74	75	76	77	78	79	80	81
CUMULATIVE TOTALS	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062
MEDICAL SERVICES	$275,162	$279,706	$284,261	$288,827	$293,404	$297,993	$302,593	$307,204	$311,827	$316,150
MEDICAL COMMODITIES	$287,106	$294,928	$302,673	$310,342	$317,934	$325,452	$332,895	$340,265	$347,562	$354,302
NON MED SERVICES	$376,163	$387,594	$398,997	$410,372	$421,719	$433,038	$444,329	$455,592	$466,828	$477,284
NON MED COMMODITIES	$23,687	$24,301	$24,907	$25,506	$26,097	$26,681	$27,257	$27,827	$28,389	$28,908
GRAND TOTAL	$962,119	$986,529	$1,010,838	$1,035,046	$1,059,154	$1,083,163	$1,107,074	$1,130,888	$1,154,605	$1,176,643

Smith Economics Group, Ltd.

Life Care Plan Costs

TABLE 25

TOTAL

Table 26

LOSS OF PAST RVL TO HEATH - LOWER
2017 - 2022

YEAR	AGE	RVL	CUMULATE
****	***	********	********
2017	36	$23,707	$23,707
2018	37	83,983	107,690
2019	38	85,906	193,596
2020	39	87,074	280,670
2021	40	93,204	373,874
2022	41	81,509	$455,383

HEATH GARCIA $455,383

Table 27

PRESENT VALUE OF FUTURE RVL TO HEATH - LOWER
2022 - 2062

YEAR	AGE	RVL	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	******	********	**********	**********
2022	41	$16,356	0.99792	$16,322	$16,322
2023	42	97,865	0.98560	96,456	112,778
2024	43	97,865	0.97343	95,265	208,043
2025	44	97,865	0.96141	94,088	302,131
2026	45	97,865	0.94954	92,927	395,058
2027	46	97,865	0.93782	91,780	486,838
2028	47	97,865	0.92624	90,646	577,484
2029	48	97,865	0.91480	89,527	667,011
2030	49	97,865	0.90351	88,422	755,433
2031	50	97,865	0.89236	87,331	842,764
2032	51	97,865	0.88134	86,252	929,016
2033	52	97,865	0.87046	85,188	1,014,204
2034	53	97,865	0.85971	84,136	1,098,340
2035	54	97,865	0.84910	83,097	1,181,437
2036	55	97,865	0.83862	82,072	1,263,509
2037	56	97,865	0.82826	81,058	1,344,567
2038	57	97,865	0.81804	80,057	1,424,624
2039	58	97,865	0.80794	79,069	1,503,693
2040	59	97,865	0.79796	78,092	1,581,785
2041	60	97,865	0.78811	77,128	1,658,913
2042	61	97,865	0.77838	76,176	1,735,089
2043	62	97,865	0.76877	75,236	1,810,325
2044	63	97,865	0.75928	74,307	1,884,632
2045	64	97,865	0.74991	73,390	1,958,022
2046	65	97,865	0.74065	72,484	2,030,506
2047	66	97,865	0.73151	71,589	2,102,095
2048	67	97,865	0.72248	70,706	2,172,801
2049	68	97,865	0.71356	69,833	2,242,634
2050	69	97,865	0.70475	68,970	2,311,604
2051	70	97,865	0.69605	68,119	2,379,723
2052	71	97,865	0.68745	67,277	2,447,000
2053	72	97,865	0.67897	66,447	2,513,447
2054	73	97,865	0.67058	65,626	2,579,073
2055	74	97,865	0.66230	64,816	2,643,889
2056	75	97,865	0.65413	64,016	2,707,905
2057	76	97,865	0.64605	63,226	2,771,131
2058	77	97,865	0.63808	62,446	2,833,577
2059	78	97,865	0.63020	61,675	2,895,252
2060	79	97,865	0.62242	60,913	2,956,165
2061	80	97,865	0.61473	60,161	3,016,326
2062	81	90,089	0.60774	54,751	$3,071,077

HEATH GARCIA $3,071,077

Table 28

PRESENT VALUE OF NET RVL TO HEATH - LOWER
2017 - 2062

YEAR	AGE	RVL	CUMULATE
****	***	**********	**********
2017	36	$23,707	$23,707
2018	37	83,983	107,690
2019	38	85,906	193,596
2020	39	87,074	280,670
2021	40	93,204	373,874
2022	41	97,831	471,705
2023	42	96,456	568,161
2024	43	95,265	663,426
2025	44	94,088	757,514
2026	45	92,927	850,441
2027	46	91,780	942,221
2028	47	90,646	1,032,867
2029	48	89,527	1,122,394
2030	49	88,422	1,210,816
2031	50	87,331	1,298,147
2032	51	86,252	1,384,399
2033	52	85,188	1,469,587
2034	53	84,136	1,553,723
2035	54	83,097	1,636,820
2036	55	82,072	1,718,892
2037	56	81,058	1,799,950
2038	57	80,057	1,880,007
2039	58	79,069	1,959,076
2040	59	78,092	2,037,168
2041	60	77,128	2,114,296
2042	61	76,176	2,190,472
2043	62	75,236	2,265,708
2044	63	74,307	2,340,015
2045	64	73,390	2,413,405
2046	65	72,484	2,485,889
2047	66	71,589	2,557,478
2048	67	70,706	2,628,184
2049	68	69,833	2,698,017
2050	69	68,970	2,766,987
2051	70	68,119	2,835,106
2052	71	67,277	2,902,383
2053	72	66,447	2,968,830
2054	73	65,626	3,034,456
2055	74	64,816	3,099,272
2056	75	64,016	3,163,288
2057	76	63,226	3,226,514
2058	77	62,446	3,288,960
2059	78	61,675	3,350,635
2060	79	60,913	3,411,548
2061	80	60,161	3,471,709
2062	81	54,751	$3,526,460

HEATH GARCIA $3,526,460

Table 29

LOSS OF PAST RVL TO HEATH - UPPER
2017 - 2022

YEAR	AGE	RVL	CUMULATE
****	***	********	********
2017	36	$27,658	$27,658
2018	37	97,980	125,638
2019	38	100,224	225,862
2020	39	101,587	327,449
2021	40	108,738	436,187
2022	41	95,094	$531,281

HEATH GARCIA $531,281

Table 30

PRESENT VALUE OF FUTURE RVL TO HEATH - UPPER
2022 - 2062

YEAR	AGE	RVL	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*******	********	**********	**********
2022	41	$19,081	0.99792	$19,042	$19,042
2023	42	115,317	0.98560	113,656	132,698
2024	43	116,470	0.97343	113,375	246,073
2025	44	117,635	0.96141	113,095	359,168
2026	45	118,811	0.94954	112,816	471,984
2027	46	119,999	0.93782	112,537	584,521
2028	47	121,199	0.92624	112,259	696,780
2029	48	122,411	0.91480	111,982	808,762
2030	49	123,635	0.90351	111,705	920,467
2031	50	124,871	0.89236	111,430	1,031,897
2032	51	126,120	0.88134	111,155	1,143,052
2033	52	127,381	0.87046	110,880	1,253,932
2034	53	128,655	0.85971	110,606	1,364,538
2035	54	129,942	0.84910	110,334	1,474,872
2036	55	131,241	0.83862	110,061	1,584,933
2037	56	132,553	0.82826	109,788	1,694,721
2038	57	133,879	0.81804	109,518	1,804,239
2039	58	135,218	0.80794	109,248	1,913,487
2040	59	136,570	0.79796	108,977	2,022,464
2041	60	137,936	0.78811	108,709	2,131,173
2042	61	139,315	0.77838	108,440	2,239,613
2043	62	140,708	0.76877	108,172	2,347,785
2044	63	142,115	0.75928	107,905	2,455,690
2045	64	143,536	0.74991	107,639	2,563,329
2046	65	144,971	0.74065	107,373	2,670,702
2047	66	146,421	0.73151	107,108	2,777,810
2048	67	147,885	0.72248	106,844	2,884,654
2049	68	149,364	0.71356	106,580	2,991,234
2050	69	150,858	0.70475	106,317	3,097,551
2051	70	152,367	0.69605	106,055	3,203,606
2052	71	153,891	0.68745	105,792	3,309,398
2053	72	155,430	0.67897	105,532	3,414,930
2054	73	156,984	0.67058	105,270	3,520,200
2055	74	158,554	0.66230	105,010	3,625,210
2056	75	160,140	0.65413	104,752	3,729,962
2057	76	161,741	0.64605	104,493	3,834,455
2058	77	163,358	0.63808	104,235	3,938,690
2059	78	164,992	0.63020	103,978	4,042,668
2060	79	166,642	0.62242	103,721	4,146,389
2061	80	168,308	0.61473	103,464	4,249,853
2062	81	156,485	0.60774	95,102	$4,344,955

HEATH GARCIA $4,344,955

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                          Table 31

          PRESENT VALUE OF NET RVL TO HEATH - UPPER
                        2017 - 2062

          YEAR    AGE       RVL        CUMULATE
          ****    ***    *********    **********
          2017    36     $27,658        $27,658
          2018    37      97,980        125,638
          2019    38     100,224        225,862
          2020    39     101,587        327,449
          2021    40     108,738        436,187
          2022    41     114,136        550,323
          2023    42     113,656        663,979
          2024    43     113,375        777,354
          2025    44     113,095        890,449
          2026    45     112,816      1,003,265
          2027    46     112,537      1,115,802
          2028    47     112,259      1,228,061
          2029    48     111,982      1,340,043
          2030    49     111,705      1,451,748
          2031    50     111,430      1,563,178
          2032    51     111,155      1,674,333
          2033    52     110,880      1,785,213
          2034    53     110,606      1,895,819
          2035    54     110,334      2,006,153
          2036    55     110,061      2,116,214
          2037    56     109,788      2,226,002
          2038    57     109,518      2,335,520
          2039    58     109,248      2,444,768
          2040    59     108,977      2,553,745
          2041    60     108,709      2,662,454
          2042    61     108,440      2,770,894
          2043    62     108,172      2,879,066
          2044    63     107,905      2,986,971
          2045    64     107,639      3,094,610
          2046    65     107,373      3,201,983
          2047    66     107,108      3,309,091
          2048    67     106,844      3,415,935
          2049    68     106,580      3,522,515
          2050    69     106,317      3,628,832
          2051    70     106,055      3,734,887
          2052    71     105,792      3,840,679
          2053    72     105,532      3,946,211
          2054    73     105,270      4,051,481
          2055    74     105,010      4,156,491
          2056    75     104,752      4,261,243
          2057    76     104,493      4,365,736
          2058    77     104,235      4,469,971
          2059    78     103,978      4,573,949
          2060    79     103,721      4,677,670
          2061    80     103,464      4,781,134
          2062    81      95,102     $4,876,236


          HEATH GARCIA $4,876,236
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Table 32

LOSS OF PAST RELATIONSHIP TO VALERINE
2017 - 2022

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	************	********
2017	34	$23,707	$23,707
2018	35	83,983	107,690
2019	36	85,906	193,596
2020	37	87,074	280,670
2021	38	93,204	373,874
2022	39	81,509	$455,383
GARCIA		$455,383	

Table 33

PRESENT VALUE OF FUTURE RELATIONSHIP TO VALERINE
2022 - 2068

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	************	********	**********	**********
2022	39	$16,356	0.99792	$16,322	$16,322
2023	40	97,865	0.98560	96,456	112,778
2024	41	97,865	0.97343	95,265	208,043
2025	42	97,865	0.96141	94,088	302,131
2026	43	97,865	0.94954	92,927	395,058
2027	44	97,865	0.93782	91,780	486,838
2028	45	97,865	0.92624	90,646	577,484
2029	46	97,865	0.91480	89,527	667,011
2030	47	97,865	0.90351	88,422	755,433
2031	48	97,865	0.89236	87,331	842,764
2032	49	97,865	0.88134	86,252	929,016
2033	50	97,865	0.87046	85,188	1,014,204
2034	51	97,865	0.85971	84,136	1,098,340
2035	52	97,865	0.84910	83,097	1,181,437
2036	53	97,865	0.83862	82,072	1,263,509
2037	54	97,865	0.82826	81,058	1,344,567
2038	55	97,865	0.81804	80,057	1,424,624
2039	56	97,865	0.80794	79,069	1,503,693
2040	57	97,865	0.79796	78,092	1,581,785
2041	58	97,865	0.78811	77,128	1,658,913
2042	59	97,865	0.77838	76,176	1,735,089
2043	60	97,865	0.76877	75,236	1,810,325
2044	61	97,865	0.75928	74,307	1,884,632
2045	62	97,865	0.74991	73,390	1,958,022
2046	63	97,865	0.74065	72,484	2,030,506
2047	64	97,865	0.73151	71,589	2,102,095
2048	65	97,865	0.72248	70,706	2,172,801
2049	66	97,865	0.71356	69,833	2,242,634
2050	67	97,865	0.70475	68,970	2,311,604
2051	68	97,865	0.69605	68,119	2,379,723
2052	69	97,865	0.68745	67,277	2,447,000
2053	70	97,865	0.67897	66,447	2,513,447
2054	71	97,865	0.67058	65,626	2,579,073
2055	72	97,865	0.66230	64,816	2,643,889
2056	73	97,865	0.65413	64,016	2,707,905
2057	74	97,865	0.64605	63,226	2,771,131
2058	75	97,865	0.63808	62,446	2,833,577
2059	76	97,865	0.63020	61,675	2,895,252
2060	77	97,865	0.62242	60,913	2,956,165
2061	78	97,865	0.61473	60,161	3,016,326
2062	79	97,865	0.60714	59,418	3,075,744
2063	80	97,865	0.59965	58,685	3,134,429
2064	81	97,865	0.59225	57,961	3,192,390
2065	82	97,865	0.58493	57,244	3,249,634
2066	83	97,865	0.57771	56,538	3,306,172
2067	84	97,865	0.57058	55,840	3,362,012
2068	85	91,430	0.56399	51,566	$3,413,578

VALERINE GARCIA $3,413,578

SMITH ECONOMICS GROUP, LTD.   312/943-1551

Table 34

PRESENT VALUE OF NET RELATIONSHIP TO VALERINE
2017 - 2068

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	***********	*********
2017	34	$23,707	$23,707
2018	35	83,983	107,690
2019	36	85,906	193,596
2020	37	87,074	280,670
2021	38	93,204	373,874
2022	39	97,831	471,705
2023	40	96,456	568,161
2024	41	95,265	663,426
2025	42	94,088	757,514
2026	43	92,927	850,441
2027	44	91,780	942,221
2028	45	90,646	1,032,867
2029	46	89,527	1,122,394
2030	47	88,422	1,210,816
2031	48	87,331	1,298,147
2032	49	86,252	1,384,399
2033	50	85,188	1,469,587
2034	51	84,136	1,553,723
2035	52	83,097	1,636,820
2036	53	82,072	1,718,892
2037	54	81,058	1,799,950
2038	55	80,057	1,880,007
2039	56	79,069	1,959,076
2040	57	78,092	2,037,168
2041	58	77,128	2,114,296
2042	59	76,176	2,190,472
2043	60	75,236	2,265,708
2044	61	74,307	2,340,015
2045	62	73,390	2,413,405
2046	63	72,484	2,485,889
2047	64	71,589	2,557,478
2048	65	70,706	2,628,184
2049	66	69,833	2,698,017
2050	67	68,970	2,766,987
2051	68	68,119	2,835,106
2052	69	67,277	2,902,383
2053	70	66,447	2,968,830
2054	71	65,626	3,034,456
2055	72	64,816	3,099,272
2056	73	64,016	3,163,288
2057	74	63,226	3,226,514
2058	75	62,446	3,288,960
2059	76	61,675	3,350,635
2060	77	60,913	3,411,548
2061	78	60,161	3,471,709
2062	79	59,418	3,531,127
2063	80	58,685	3,589,812
2064	81	57,961	3,647,773
2065	82	57,244	3,705,017
2066	83	56,538	3,761,555

Table 34 (Cont.)

PRESENT VALUE OF NET RELATIONSHIP TO VALERINE
2017 - 2068

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	************	*********
2067	84	55,840	3,817,395
2068	85	51,566	$3,868,961
GARCIA		$3,868,961	