



INFORMATION REQUIRED FOR *Examination for Discovery*

Before the *Examination for Discovery*, obtain a copy of the plaintiff's resume (or *Employment/Education Diary*) to review the following with him/her:

[1] LOSS OF INCOME (NOT SELF-EMPLOYED)

Employment Information

- Does this represent all of your work experience and certification? (If not, identify additional experience or certification).
- Identify duration of jobs, i.e. start and stop dates (month, year).
- Identify any gaps in employment history (e.g. searching for work, choosing not to work, etc.).
- For each job termination, was it voluntary or involuntary? If dismissed, was the reason for dismissal due to lay-off, being fired, position becoming redundant, or no work available, etc.
- Was the plaintiff's position part-time, full-time, permanent, contract or temporary?
- Identify fringe benefits for each job, and ask plaintiff to itemize various benefits.
- What was the employer's cost of any fringe benefits (dollars per month) and proportion of cost-sharing with the employer? (i.e. 1/3, 1/2, etc.)
- What were the plaintiff's wage rates at each job?
- What were the plaintiff's hours of work (officially, and unofficially) at each job?

Retirement

- Did the plaintiff plan a specific retirement age before date of accident?
- Partner's date of birth and retirement plans, if applicable.
- Other than current membership in pension plan, what was the balance of the plaintiff's investment portfolio at the date of the accident?

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Absence from the workforce

- Have there been any absences due to child-rearing or for reasons other than disability arising from the accident?
- If he/she works at a seasonal job, how many months per year do they work for pay? Of those months, does the plaintiff work continuously? (i.e. 40 hours/week)
- Does he/she plan to take time off from working to have or to take care of children?
- If the plaintiff plans to leave the labour force for child-rearing reasons, what is the anticipated length of absence?

[2] LOSS OF INCOME (SELF-EMPLOYED)

- What is the primary service or product provided by the plaintiff?
- Request a listing of clients/customers.
- What is the plaintiff's market share in the industry.
- Request a list of the plaintiff's competitors.
- Does the plaintiff have any plans for diversification?
- How many employees and offices does the plaintiff have?
- Request a copy of the plaintiff's most recent business plan.
- Request financial statement and tax returns for at least 5 (five) years before the accident.
- What is the plaintiff's regular salary draw?
- Did the plaintiff pay him/herself bonuses or dividends? Did he/she pay any other family members from business accounts?
- Did the plaintiff have any capital acquisitions? If so, what were the acquisitions and their cost?
- Has the plaintiff had any business loans in the last five years? If so, please ask for a copy of the documentation given to the bank when he/she applied for a loan.

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- Has the plaintiff replaced any labor/management contributions with existing or new employees? If so, identify names of employees and an itemization of wages paid to these employees strictly attributable to the replacement of the injured party's contribution.

[3] HOUSEKEEPING

- What is the number of hours per week the plaintiff spends now, compared to what they spent before the accident?
- Who is doing housework now? How much are they being paid?
- Where did they live before date of accident? (on an acreage, farm, large home, etc.)
- Where do they live now? (apartment, house, etc.)

Do not send originals. Please forward copies only.

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