

INFORMATION REQUIRED FOR *Personal Injury Assessments - Adults*

Basic information from the claimant¹:

- Claimant's date of birth.
- Contact names and phone numbers of plaintiff / family and employer (if available).
- Date of incident.
- Date of trial or anticipated settlement date (some reference date is needed for calculations to separate pre-trial and future potential losses).
- Detailed resume or profile of the plaintiff's education and employment history (*Employment/Education Diary*).
- Plaintiff's income tax returns for as many years as possible (at minimum 10 (ten) years prior to the incident to the present). If tax returns not filed/unavailable, then copies of T4s.

{Please note that *Notices of Assessment* are **not** sufficient for our purposes. If the plaintiff is self-employed, please use a *Self-Employed Checklist* and provide corporate tax returns or financial statements}.

- Claimant's year-to-date income (i.e. a copy of their most recent pay stub).
- Information with regard to the existence of any unreported or "cash" income.
- Canada Pension Plan Contributor Statement* **and** any information regarding pre-incident contributions to any company or government pension plans.
- Completed *HALS/PALS questionnaires* from Brown Economic (see attached).
- Vocational or neuropsychological assessment.
- Cost of care report.

¹ We do not rely upon *Examination for Discovery* transcripts of plaintiffs to obtain information about the plaintiff's employment or income history or other salient details. The decision in *Elgert v. Home Hardware Stores Limited*, 2010 ABQB 43, released Jan. 20, 2010, maintained that experts should not rely upon "full transcripts from Examinations for Discovery" because they are not evidence. (para. [17]) Instead, we prefer the documents listed in these checklists.

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Information regarding the claimant's employment:

- Request letters from the plaintiff's employer(s) both before and since the incident to capture:
 - Employment status (full time, part-time, permanent, casual, contract, temporary)
 - Hours of work per week and weeks of work per year
 - Base salary/wages including any overtime or bonuses (pay records, hours worked at straight time and overtime rates)
 - Pre-incident fringe benefits (employer contributions [e.g. employer dollar cost per employee] to medical and dental coverage, disability and life insurance, and/or pension plan)
 - Collective agreements (if unionized) from date of incident to the present.
- Plaintiff's reasons for leaving employment (voluntary or involuntary), gaps in employment and whether job still exists at pre-incident place of employment.
- Employment personnel records prior to and after incident.
- Authorization to speak to claimant's employer.

Supplementary Information

- Information concerning the plaintiff's intended pre and post-incident aspirations regarding retirement (if such aspirations were formed before the incident), or if claimant is near or older than age 45 at time of incident.
- Current (prior 2 [two] years) legal and medical reports pertaining to:
 - Extent of injuries
 - Likely prognosis
 - Impact on employment or hours of work.

Do not send originals. Please forward copies only.

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