• SPINA BIFIDA
  o meningomyelocele (most severe form)
  o surgical closure three days after birth
  o second surgery required

• HYDROCEPHALUS
  o Buildup of cerebral spinal fluid on the brain
  o Requiring Shunting
  o 1983—seven days after birth
  o 1984—repair of initial shunt
  o 2001—third ventriculostomy shunt procedure

• PARAPALIGIA
  o Seizure at around age 5
  o After seizure uses crutches, walker and braces
  o Fractured leg at age 14—wheelchair ever since
  o Both legs partially paralyzed with neurogenic bowel and bladder

• DECUBITIS ULCERS/PRESSURE SORES
  o Continuous, ongoing problem multiple locations—heals, sacrum, buttocks, thighs
  o Pictures from wound clinics

• OSTEOMYELITIS
  o Infection of the bone which led to amputations

• BILATERAL BELOW-THE-KNEE AMPUTATIONS
  o Right leg—January 2008
  o Left leg—April 2011

• NEUROGENIC BLADDER/ INCONTINENCE
  o Self-Catheterizes

• INFECTIONS ILENE REPEATEDLY CONTENTS WITH
  o Cellulitis
  o Sepsis
  o MRSA
  o VRE
  o Urinary tract

• DEVELOPMENTAL DELAY
  o See report of Dr. Elizabeth Leonard, PhD

• INTELLECTUAL DISABILITY
  o See report of Dr. Elizabeth Leonard, PhD
## Economic Damages Summary

<table>
<thead>
<tr>
<th>Category</th>
<th>Lower Bound Present Value</th>
<th>Upper Bound Present Value</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Future Care</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Life Expectancy 48.2 Years</td>
<td>$4,915,683</td>
<td>$6,997,756</td>
</tr>
<tr>
<td><strong>Diminished Earnings Capacities</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High School Education</td>
<td>$1,479,296</td>
<td>$1,642,100</td>
</tr>
<tr>
<td>College Education</td>
<td>$2,705,117</td>
<td>$3,049,892</td>
</tr>
</tbody>
</table>
Third Ventriculostomy

Banner Baywood Medical Center

Wound Assessment Details

Patient Name:  
Date: 9/25/2007  
Clinician: Lane, Sandra, RN, BSN, COCN, CWCN  
Physician / Extender: DAVIS CWS, CHRISTINE

Patient Number: 

Patient Date of Birth:

Wound Status

Wound Number: 1  
Wound Status: Not Healed  
Wound Location: Right Heel  
Wound Type: Pressure Ulcer

Photos

Wound Measurements

<table>
<thead>
<tr>
<th>Measurement</th>
<th>Value</th>
<th>Tunneling</th>
<th>Undermining</th>
<th>Sinus Tract</th>
</tr>
</thead>
<tbody>
<tr>
<td>Length: (cm)</td>
<td>6</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Width: (cm)</td>
<td>7</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Depth: (cm)</td>
<td>1.1</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hypergranulated:</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area: (sq cm) based on n*(L*W)/4</td>
<td>32.986</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume: (cm³) based on Area*D</td>
<td>36.284</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Wound Description

Wound Progress: Initial Exam  
Exposed Structure

Report of Preliminary Neuropsychological Consultation

Name:
Date of Birth:
Age: 32
Dates of Evaluation: 4/11/16, 4/12/16, 4/18/16
Date of Report: 8/29/16

I. Basis for Referral:

is a 32-year old, right handed woman with spina bifida, hydrocephalus, and intellectual
disability who was referred for a forensic neuropsychological assessment by Attorney Randall Hinsch
of the law offices of Plattner Verderame P.C. Ms. is a plaintiff in a lawsuit alleging intellectual
and physical disabilities caused by prenatal exposure to teratogens during her mother’s
confinement. I was asked to evaluate her intellectual and emotional function to determine the
extent of her cognitive impairments and her future needs regarding her ability to care for herself
resulting from this putative toxic exposure. I was also asked to opine as whether Ms. required a
guardian and whether she had the capacity to testify at deposition or trial.

II. Forensic Advisement and Informed Consent:

Before beginning this assessment, the purpose of a forensic psychological evaluation was explained
to Ms. who understood that Attorney Hinsch requested this evaluation. I informed Ms.
that this examination did not constitute any type of psychologist-patient relationship and that
any information provided could be used in litigation. I explained that information obtained during
clinical interviews, testing or through materials furnished by Attorney Hinsch would be used in
formulating my opinions regarding her cognitive, psychological and emotional function. Ms.
understood that any report generated from this evaluation would likely be used as a basis for
testimony regarding my evaluation. Ms. indicated that she understood the procedural
guidelines for this evaluation. I asked her to read my standard informed consent document in my
presence. She was unable to read this document. I reviewed it in detail and she acknowledged that
she understood the basic constructs of this evaluation. Ms. had an opportunity to ask
questions before signing the document. She had limited understanding factual understanding of what
would be done during this assessment and how her attorney might use this information. She did not
May 8, 2017

Mr. Randall A. Hinsch
Attorney at Law
Plattner Verderame PC
316 East Flower Street
Phoenix, Arizona 85012-2612

Dear Mr. Hinsch:

Upon your request, an update to the January 17, 2017 Life Care Plan was completed concerning the expected costs associated with the long-term medical care of . In completing this update, I consulted with Dr. Alan Anschel on April 28, 2017 and reviewed the following documents:

- Medical Records and Bills from All Valley Home Health;
- Medical Records and Bills from Crisis Preparation and Recovery, Inc.;
- Medical Records from Sun Valley Plastic Surgery, Dr. Duc Pham;
- Medical Records from Banner General Surgery;
- Updated Medical Records from Banner Baywood Medical Center;
- Life Care Plan Review and Analysis by Shay Jacobson, RN, MA, NMG, LNCC, CNLCP (2/2/2017).

Based upon this information, changes were made to future medical care, therapy, home assistance, transportation, and equipment. The life expectancy was also updated based upon her current age and the most recent United States Life Tables. Please find enclosed my revised grids. Should you have any questions, please do not hesitate to contact me. If additional information is received or reviewed, this plan may be amended.

Sincerely,
VOCATIONAL ECONOMICS, INC.

For the Firm

Laura J. Lampton, RN, BSN, CRRN, CNLCP
/ljl/
# Life Care Plan for:
**Attorney:** Randall A. Hinsch  
**Planner:** Laura Lampton

<table>
<thead>
<tr>
<th>Medications</th>
<th>Frequency</th>
<th>Annual Cost</th>
<th>Phase Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tizanidine 8mg</td>
<td>1 Rx(s) Monthly at $85.67 each</td>
<td>$1,028.04</td>
<td>$49,654</td>
</tr>
<tr>
<td>Now to Life Expectancy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Omeprazole 20mg</td>
<td>1 Rx(s) Monthly at $31.74 each</td>
<td>$380.88</td>
<td>$18,397</td>
</tr>
<tr>
<td>Now to Life Expectancy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sertraline 100mg</td>
<td>1 Rx(s) Monthly at $18.27 each</td>
<td>$219.24</td>
<td>$10,589</td>
</tr>
<tr>
<td>Now to Life Expectancy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>Base Case (1)</strong></td>
<td><strong>$6,979,402 to $6,997,756</strong></td>
<td></td>
</tr>
</tbody>
</table>

*Monday, May 8, 2017*
I. ISSUES

What is the 06-01-17 present value of the diminished earnings capacity to be associated with the premature ending of 's normal expected working life?

What is the 06-01-17 present value of the future care costs that is expected to encounter during her normal life expectancy?

II. SUMMARY OF ANALYSIS

<table>
<thead>
<tr>
<th>06-01-17 Present Value of</th>
<th>'s</th>
<th>06-01-17 Present Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diminished Earnings Capacity and Future Care Costs</td>
<td></td>
<td>Lower Bound</td>
</tr>
<tr>
<td></td>
<td>Present Value</td>
<td>Present Value</td>
</tr>
</tbody>
</table>

DIMINISHED EARNINGS CAPACITY*

<table>
<thead>
<tr>
<th>High School Education</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Trial Period</td>
<td>15.92 years</td>
<td></td>
</tr>
<tr>
<td>Post-Trial Expected Working Life</td>
<td>22.7 years</td>
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<tr>
<td>Money Earnings</td>
<td>$1,192,980</td>
<td>$1,324,274</td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td>$286,316</td>
<td>$317,826</td>
</tr>
<tr>
<td></td>
<td>$1,479,296</td>
<td>$1,642,100</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>College Education</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Trial Period</td>
<td>11.92 years</td>
<td></td>
</tr>
<tr>
<td>Post-Trial Expected Working Life</td>
<td>26.2 years</td>
<td></td>
</tr>
<tr>
<td>Money Earnings</td>
<td>$2,181,546</td>
<td>$2,459,590</td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td>$523,571</td>
<td>$590,302</td>
</tr>
<tr>
<td></td>
<td>$2,705,117</td>
<td>$3,049,892</td>
</tr>
</tbody>
</table>

FUTURE CARE COSTS

| Post-Trial Life Expectancy | 48.2 years | |
| Lampton Life Care Plan | $4,915,683 | $6,420,646 |

* The diminished earnings measures represent two benchmark estimates of 's pre-incident earnings capacity. Were she to have some post-trial earnings potential given the incident, the 06-01-17 present value of this earnings capacity should be deducted from the pre-incident earnings estimate. See Section III-(11) for discussion.