

*ERICKSON & ASSOCIATES*  
Consultants in Economics  
EricksonEconomics.com  
(907) 586-1290 / gerickso@alaska.com/ fax (907) 586-1987  
Office located at Suite 6, 319 Seward, Juneau  
P.O. Box 21124  
Juneau Alaska 99802-1124

## **Wrongful Death Information**

Here is the listing of materials I consider helpful in the economic analysis of wrongful death losses. The list below covers only items common to all types of wrongful death claims; additional information is usually required depending on the decedent and the types of the economic damages being claimed.

- If litigation has begun, a copy of the scheduling order.
- Copies of any stipulations regarding discovery.
- Copies of the complaint and answer, together with any amendments.
- A complete resumé for the decedent showing birth date, education and employment, including pay rates, the beginning and ending dates for each job, and the reason for leaving each job.
- The decedent's federal income tax returns and supporting schedules from the year of death and seven or more years preceding that year. If these include joint returns, it is important to obtain copies of W-2 and 1099 (misc. income) statements or other documentation *sufficient to allocate all income between the joint filers*.
- If not included with the above, a complete accounting of all income earned or collected. This should include the amount of income from each source of the income, by year. Including copies of W-2 and 1099 (misc. income) statements, if available.
- In cases where complete historical tax return information is unavailable, Social Security Administration certified account statements can be helpful. Due to possible delay in obtaining a response from SSA, this statement should be requested at the earliest possible date.
- Copies of performance evaluations prepared by the decedent's employers, and papers documenting hiring, discharge, and other changes in his or her work status during the same seven-year period

- A signed release authorizing me to review the decedent's retirement accounts held by his or her employer.
- Documentation of decedent's retirement accounts (including SBS, deferred compensation, 409k or other savings plans), even if he or she withdrew the contributions.
- Information on ongoing or future medical expenses, including any life care evaluations.
- Information on decedent's medical conditions that would have been likely to affect future earning ability or life expectancy (for example, HIV infection, diabetes, or alcoholism).
- \*Information on any history of tobacco use in the five years before decedent's death.
- \*A copies of deposition testimony if it has been taken, and documents generated on either side as a result of discovery that might bear on earnings had he or she not died.

Don't be dismayed if you can't get everything. Rarely is that possible. But be sure to make a real effort to pull together what you can, and don't delay sending what you have while you wait for something missing to be found.

After I review the written material, I may wish to arrange an interview with the plaintiff or others who knew the decedent.