10-11016 Smith v. State Farm Mutual Automobile Insurance Co. Exhibit - Amended Disclosures

C. Computation of Damages

1. Attendant Care Expenses

For the time period December 20, 2008 thr ough January 31, 2011, Plaintiff claims that she incurred attendant care expenses. Over this 25 month period, Patricia Smith and/or her husband John Smith provided assistance with Plaintiff's personal needs at least four hours/day, for a total number of 3,205 hours. At a rate of \$18.00/hour, this yields an attendant care claim of \$59,490. (See Attendant Care forms, attached as Exhibit 1).

2. Replacement Services Expenses

For the time period February 1, 2009 to September 9, 2010, the three year anniversary of the accident, Plaintiff claims that she incurred replacement services provided by Patricia Smith. Over this 19 month period, Patricia Smith provided chore services for Plaintiff every day of the week. At a rate of \$20/day, Plaintiff computes this item of damage to be \$11,400. (See Replacement Service Forms, attached as Exhibit 2.)

(Doc. 16-6, pp. 18-19).