

# RAFFA CONSULTING

Economists, Inc.

## RCE Requested Information - Employment Dispute Matters

### I. Background Information on the Plaintiff:

- A. Name of Plaintiff: \_\_\_\_\_
- B. Date of Birth: \_\_\_\_\_
- C. Race: White \_\_\_ Black \_\_\_ Other \_\_\_ (Specify)
- D. Sex/Gender: \_\_\_\_\_ Male or Female
- E. Date of termination / Discharge \_\_\_\_\_
- F. Does the Plaintiff allege a loss occurred prior to the termination / discharge date? Y or N  
- Dates of applicable time period of alleged pre-termination loss: \_\_\_\_\_
- G. Anticipated Trial/Mediation date(s): \_\_\_\_\_

***Please compile and forward to RCE the following documentation for any/all applicable components of damage:***

### II. EARNINGS – Potential Loss of Earnings:

- A. Plaintiff's Pre-Incident Earnings:
  - 1) Plaintiff's full income tax returns, W-2 forms and pay stubs, for (3) three to five (5) years prior to the incident;
  - 2) Copy of any/all employment contracts, agreements, terms of agreements, bonuses, overtime and/or other description of wage/salary compensation, including promotion dates and wage change dates and amounts, and annual hours actually worked.
- B. Similarly-Situated Employees: Copies of any and all known information related to Defendant's compensation of other employees similarly situated to the Plaintiff. This request encompasses both the three (3) to five (5) year pre-incident period, as well as the post-incident (to present) period.
- C. Plaintiff's Mitigation Earnings: Any and all documentation of the Plaintiff's post-incident earnings compensation.

**III. PENSION – Potential Loss of Pension/Retirement Benefit Accrual:**

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|----|-----------------------------------|--|
| A. | Plaintiff's Pre-Incident Pension: | Copies of plaintiff's pension plan (including any formulas), employer matching plans (with percentage), profit sharing, vesting schedules, etc. at the time of termination.                              |
| B. | Similarly-Situated Employees:     | Copies of Defendant's related pension or applicable retirement-based documentation in the period subsequent to Plaintiff's termination, for employees similarly situated to the Plaintiff.               |
| C. | Plaintiff's Mitigating Pension:   | Copies of plaintiff's current mitigating pension plan (including any formula), employer matching plans (with percentage), profit sharing, vesting schedules, etc., and post-termination accrual of same. |

**IV. MEDICAL - Loss of Medical & Medically Related Benefits:**

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|----|--|---|
| A. | Plaintiff's Pre-Incident Benefits:     | Copies of the payments made by the Plaintiff for medical coverage, while employed by the defendant(s).                                    |
| B. | Similarly-Situated Employees:          | Copies of Defendant's related medical coverage expenses after Plaintiff's termination, for employees similarly situated to the Plaintiff. |
| C. | Plaintiff's Post-termination Expenses: | Copies of out-of-pocket expenses paid by the Plaintiff in the post-incident period.   |

**V. ALL OTHER EXPENSES AND/OR BENEFITS:**

Copies of all other expenses paid by the Plaintiff in the post-incident period, which allegedly would have been paid by the Defendant, had the Plaintiff continued to work for the Defendant in the post-termination period. This component may consist of expenses such as auto/travel, cell phone, insurance policies and technology (lap-top, etc). Additionally, any other benefits provided by the Defendant to the Plaintiff during employment, that are no longer received by the Plaintiff.