

# Personal Injury Damages Quantification Information Checklist Defence

REPORTS	Employed	Self-Employed	
		Unincorp'd	Incorp'd
(1) Plaintiff Loss of Income Report (see scope of review section).			
(2) Other Reports: IRB, FCC, Vocational, Rehabilitation and Medical Reports, etc.			
<b>GENERAL INFORMATION</b>			
(3) Statement of Claim/Defence.			
(4) Transcripts of the Examination for Discovery.			
(5) Collateral Benefits: A list describing the nature and amount paid.			
<b>TAX INFORMATION</b>			
(6) Personal income tax returns for the five years prior to the accident up to the present date, including all attachments such as T4 slips and tax schedules (ie. statement of business activities).			
(7) Tax returns of the business for the five years prior to the accident up to the current date.	N/A	N/A	
(8) Notices of Assessment for the above tax returns. Alternatively, certified copies of personal income tax returns from Revenue Canada.			
<b>EMPLOYMENT INFORMATION</b>			
(9) Resume or Curriculum Vitae.			
(10) Employment letter or excerpts of employment file indicating title, role, salary/wage and period of employment.			
(11) Employee health benefit plan booklet and any other employment perks/benefits.			
(12) Union agreement.			
(13) Employer's Confirmation and Calculation of Benefits Forms.			
(14) Record of Employment.			
<b>POST-ACCIDENT EARNING CAPACITY</b>			
(15) Future earning capacity limitations, competitive disadvantage and/or loss of advancement.			
(16) Identification of potential early retirement.			
<b>BUSINESS INFORMATION</b>			
(17) Ownership structure: details of shareholders or partners and their percentage interest.	N/A		
(18) Financial statements of the business for the five years prior to the accident up to the current date (including monthly financial statements, if available).	N/A		
(19) Access to books and records of the business for the period five years prior to the accident to the present date ( <b>Trial Balance</b> , General Ledger, Sales Journals/ Records, Payroll Journals/Records, GST returns, etc.)	N/A		
(20) Contact information of the external accountant.	N/A		
<b>REVENUE &amp; EXPENSE INFORMATION</b>			
(21) List of specific customers lost as a result of the accident and revenue earned from these customers.	N/A		
(22) List of expenses incurred to mitigate damages including description, amounts and invoices.	N/A		
(23) Identification of remuneration paid to <b>owners</b> and non-arm's length parties (family members, other related businesses, etc.)	N/A		
(24) Identification of family members who provide services at no cost or below market rates.	N/A		
(25) Summary of payments received from or paid to other businesses owned by the injured party.	N/A		
(26) Identification of unusual, non-recurring or discretionary revenues and expenses during the period for which the financial statements were obtained.	N/A		

The above is not intended to be an exhaustive checklist of information that may be required in each and every situation encountered, but is intended as a general guideline and starting point for collecting basic information. Typically, additional information related specifically to the case in question will be required.

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