

**WRONGFUL TERMINATION—QED RESEARCH, INC. INFORMATION
CHECKLIST**

Date _____ Trial date _____ Trial location _____

1. Case name _____ (P or D?)

2. Full names of plaintiffs _____

3. Dates of birth _____ Dates of termination _____

4. Sex _____ Education _____

5. Date of hire in terminated job _____

6. Did plaintiff(s) have any medical or other characteristics that would have reduced worklife expectancy? _____

7. Job as of date of termination _____

8. Employer name and phone _____

9. Hourly, or weekly, or monthly, or annual rate of pay in terminated job? _____

10. History of pay in the terminated job, including pay raises, anniversary dates, promotions, performance evaluations, etc. _____

Please provide supporting pay records, W2s, etc.

11. Types of fringe benefits in terminated job (health plan, employer contribution to retirement, bonus plan, or other benefits) _____

Please provide information

12. Please provide information on any “last paycheck” payments, such as severance pay, pay for unused vacation or sick days, or retirement plan distributions, or other payments _____

12. Please provide the types of information in items #10 and #11 for all previous jobs in the 10 years preceding termination.

13. Please provide the types of information in items #10 and #11 for any jobs held since the date of termination.

14. Is there a Vocational Rehabilitation Expert involved in this case? If so, has there been a VR report generated? If so, please provide a copy of the report.

15. Did the company from which the employee was termination have an options plan? If so, please provide information on the options that the individual was granted, the vesting dates, the option strike prices, whether the individual exercised options, and when_____

16. Please provide information on the individual's post-termination job searches_____

17. If the individual has not returned to work as of date of trial, what is the estimated date of return to work?_____

18. Is the individual seeking to mitigate damages via self-employment? If so, please provide an explanation_____

19. Has the individual tried to mitigate damages via retraining? If so, please provide a description_____

20. Opposing counsel_____ **Opposing expert**_____