

KENNETH J. BOUDREAU, Ph.D.
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To Whom It May Concern:

In response to your request for my fee structure, in personal injury and wrongful death cases the total cost of an analytical report usually runs about \$1,800 to \$2,200 per plaintiff (the latter in death cases where there are complications in the analysis due to children and/or spouse income) if little extra library work is required. Valuation of life care plans is more complex than lost earnings analysis, and is a function of the complexity of the life care plan submitted to us for valuation (I have seen these range from less than \$1,000.00 to nearly \$6,000.00). My depositions are \$1,250 for preparation and the first hour with the regular hourly rate applying thereafter for any full or part hours, if the deposition is given in my Bordeaux Street office, with a minimum deposition charge of \$1,250.00. Otherwise I bill depositions the same as any other consulting time (\$585.00 per hour), with an \$1,250.00 minimum. Trial testimony is a minimum of \$1,750.00 (for preparation and courtroom time up to the equivalent hourly time), and is at the hourly rate after that. Naturally, time and expenses for travel, etc. are over and above the rates quoted.

In listing potential witnesses, I suggest that you include not only me but also Dan M. Cliffe, CPA, John R. Page, CPA, Ph.D., and J. Stuart Wood, Ph.D. (the latter only when we are retained by defendants). They testify in my place on occasion when conflicting schedules require or when a live trial appearance is outside of the New Orleans area.

Sincerely,

Handwritten signature of Kenneth J. Boudreaux, Ph.D. The signature is written in black ink and includes the name 'K. Boudreaux' followed by 'Ph.D.' and a stylized flourish.

Kenneth J. Boudreaux, Ph.D.
KJB/del