Medical and mental-health billing records	Forthcoming

(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered

The disclosing party provides the following computation of each category of damages claimed, and supporting documents/evidence are included in the below chart, all of which are available by contacting the undersigned's legal assistant at the firm's general phone number:

Description	Amount
Lost Wages (Back and Front Pay)	$400,000
Lost Benefits	$300,000
Medical Expenses (treatment ongoing)	$100,000
Mental-Health Expenses (treatment ongoing)	$50,000
Emotional Distress	$5,000,000
Punitive Damages	To be determined

(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment

N/A.

McCollum Crowley P.A.

Date August 8, 2022

By: *s/ Brian J. Kluk*

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