

EXHIBIT A

Exhibit A

Alternative Future Medical Offset Opinions, Applying Defendant's Life Care Plan

Plaintiff	Condition	Defendant Life Care Plan	Alternative Future Medical Offset Amounts
Bruce Hill	CLL	Navarro	Medicare (\$295,792-\$316,870) versus VHA (\$298,345-\$322,911) ¹
Jacqueline Tukes	Kidney	Shahnasarian	Medicare versus TRICARE (\$110,100) ²
Gary McElhiney	Parkinson's	Shahnasarian	Medicare vs. TRICARE (\$206,201-\$273,874) vs. CCN/VHA (\$532,501-\$600,401) ³
Edgar Peterson	Parkinson's	Shahnasarian	Medicare (\$127,172-\$158,209) versus VHA (\$398,577-\$462,381) ⁴

Alternative Future Medical Offset Opinions, Applying Plaintiff's Life Care Plan

Plaintiff	Condition	Plaintiff Life Care Plan	Alternative Future Medical Offset Amounts
Bruce Hill	CLL	Fryar	Medicare (\$84,969) versus VHA (\$404,246-\$518,916) ⁵
Jacqueline Tukes	Kidney	Fryar	Medicare versus TRICARE (\$110,100) ⁶
Gary McElhiney	Parkinson's	Hairston	Medicare vs. TRICARE (\$1778,440-\$243,674) vs. CCN/VHA (\$1,290,196-\$1,372,014) ⁷
Edgar Peterson	Parkinson's	Hairston	Medicare (\$146,257-\$166,887) versus VHA (\$1,041,008-\$1,167,169) ⁸

¹ Tonic Rep. (Hill) at 20-25, Appendix A, Tables 11, 12, 15, 16 (JA Ex. 708, D.E. 839-6).

² Yount Rep. (Tukes) at 4-5, Table 2 (JA Ex. 725, D.E. 839-23). Notably, while Yount's Report identifies separate Medicare and TRICARE reimbursement rates identified by Henry Miller for the same services (e.g., \$21,817 under TRICARE versus \$4,954 under Medicare for the same medication), Tonic inexplicably calculated a single future offset of \$110,100. Neither Tonic's report nor deposition explains how those differing reimbursement rates were translated into a single offset opinion or how any non-offsettable TRICARE benefits were identified and could be excluded from the calculation. *See also* Miller Dep. Tr. at 177:18-20 (JA Ex. 780, D.E. 841-11) ("I can't tell you what she did here.").

³ Brod Rep. (McElhiney) at 4-9, Tables D and E, Appendix A, pp. 4-11 (JA Ex. 641, D.E. 837-5). Unlike Yount's report, Brod's report does not separately identify Medicare and TRICARE reimbursement amounts. Rather, it presents a single "Medicare/TRICARE" and a single "CCN/VHA" offset calculation, leaving unexplained whether—or to what extent—the

calculation includes non-offsettable TRICARE benefits or why the CCN/VHA calculation reflects proxy CCN reimbursement rates rather than the actual future cost of VHA care.

⁴ Brod Rep. (Peterson) at 5-7, Tables C and D, Appendix A, pp. 5-12 (JA Ex. 642, D.E. 837-6). See *supra*, n.3 (discussing the unexplained Medicare/TRICARE and CCN/CHA methodology).

⁵ Totic Rep. (Hill) at 20-25, Appendix A, Tables 9, 10, 13, 14 (JA Ex. 708, D.E. 839-6).

⁶ See *supra*, n.2. (discussing Yount's failure to explain how the single future offset amount was derived from differing Medicare and TRICARE reimbursement figures).

⁷ Brod Rep. (McElhiney) at 4-9, Tables F and G, Appendix A, pp. 4-11 (JA Ex. 641, D.E. 837-5). See *supra*, n.3 (discussing the unexplained Medicare/TRICARE and CCN/CHA methodology).

⁸ Brod Rep. (Peterson) at 5-7, Tables E and F, Appendix A, pp. 5-12 (JA Ex. 642, D.E. 837-6).