

Project Summary

(November 2008)

*UNITED STATES OF AMERICA EX. REL. PATRICK J. LOUGHREN
Plaintiff, v. UNUMPROVIDENT CORP. AND GENEX SERVICES, INC.*

Advanced Policy Solutions was retained by the law firm HellerEhrman LLP, which represented the plaintiff, Patrick J. Loughren in this litigation. HellerEhrman required the services of a recognized expert in Social Security disability evaluation, as well as SSA's case evaluation policies and procedures.

At HellerEhrman's request, Mr. Barnes developed and implemented a thorough review of approximately 1,600 Long Term Disability (LTD) claim files provided by the defendant, UnumProvident Corporation. The primary purpose of the study was to evaluate whether the individuals who filed the LTD claims appeared to meet Social Security's disability standard.

In order to fully address HellerEhrman's needs, Mr. Barnes:

- provided extensive consultation to HellerEhrman attorneys in developing the study and its procedures;
- recruited and managed a staff of 18 disability evaluation experts with extensive experience in Social Security disability claim adjudication;
- conducted training for these disability evaluators;
- developed and administered a quality control process to monitor their work; and
- prepared and submitted to HellerEhrman a report summarizing his work and providing his expert findings and conclusions.

Mr. Barnes then prepared and submitted an *Expert Report* to the United States District Court. He was deposed by defendants counsel. He later submitted a supplemental *Declaration* to the court. Finally, Mr. Barnes testified as an expert witness at the trial, and his testimony was instrumental in the plaintiff's favorable outcome in the case.