

PLAINTIFF JANE DOE'S SPECIAL VERDICT FORM

On the questions submitted, the jury finds as follows:

Question No. 1: Was Defendant negligent?

Answer: _____ (Yes or No)

*If the answer to Question No. 1 is "No", you are not to answer further questions. Your foreperson must sign this special verdict, which will be your verdict for the defendant and against the plaintiff's, and you will all return to open court.
If the answer to Question No. 1 is "Yes", you are to answer Question No. 2.*

Question No. 2: Was any negligence of Defendant a cause of the death of Jane Doe's deceased son and resulting injuries and damages to Plaintiffs?

Answer: _____ (Yes or No)

*If the answer to Question No. 2 is "No", you are not to answer further questions. Your foreperson must sign this special verdict, which will be your verdict for the defendants and against the plaintiff, and you will all return to open court.
If the answer to Question No. 2 is "Yes", you are to answer the remaining questions on this special verdict form. When as many as ten of you have agreed upon each of your answers, your foreperson must sign this special verdict, and you will all return to open court.*

Question No. 3: In accordance with the damage instructions given by the court, we find the total amount of damages suffered by each plaintiff to be:

Johnny Doe's estate c/o Jane Doe, Personal Representative: \$ _____
Jane Doe individually: \$ _____

(Here enter the total amount of damages without any reduction for comparative negligence and without any inclusion of punitive damages.)

Question No. 4: Compare the negligence of the following persons and find a percentage for each. The total of the percentages must equal 100%, but the percentage for any one or more of the persons named may be zero if you find that such person was not negligent or that any negligence on the part of such person was not a cause of damage.

Defendant: _____ %
Jane Doe: _____ % 100% TOTAL

The court will multiply the percentage of defendant times the plaintiff(s)' total damages as found by the jury under Question No. 3. The court will then enter judgment for plaintiff(s) against defendant in the proportion of damages found as to defendant. [If the percentage found by the jury for defendant is zero, then the court will enter judgment for that defendant and against the plaintiff(s).]

Question No. 5: Was the conduct by Defendant wanton or reckless?

Answer: _____ (Yes or No)

*If the answer to Question No. 5 is "No", you are not to answer further questions. Your foreperson must sign this special verdict, which will be your verdict for the defendants and against the plaintiff, and you will all return to open court.
If the answer to Question No. 5 is "Yes", you are to answer the remaining questions on this special verdict form. When as many as ten of you have agreed upon each of your answers, your foreperson must sign this special verdict, and you will all return to open court.*

Question No. 5: In accordance with the damage instructions given by the court, we award punitive damages in the following amount: \$ _____

When as many as ten of you have agreed upon this answer, your foreperson must sign this special verdict, and you will all return to open court.

Foreperson