

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR KING COUNTY

ERICKSON

Plaintiffs,

vs.

PHARMACIA LLC, a Delaware limited liability  
corporation, f/k/a Pharmacia Corporation,

Defendant.

No. 18-2-11915-4 SEA

VERDICT FORM

We, the jury, answer the questions submitted by the court as follows:

QUESTION 1: Did the defendant supply a product that was not reasonably safe in construction?

ANSWER: YES  NO

QUESTION 2: Did the defendant supply a product that was not reasonably safe as designed?

ANSWER: YES  NO

QUESTION 3: Did the defendant supply a product that was not reasonably safe because adequate warnings or instructions were not provided with the product?

ANSWER: YES  NO

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**ORIGINAL**

**QUESTION 4:** Was the defendant negligent in that the product was not reasonably safe because adequate warnings or instructions were not provided after the product was manufactured?

ANSWER: YES X NO            *- unanimous*

(If you answered "no" to Question 1 AND Question 2 AND Question 3 AND Question 4, sign this verdict form and answer no more questions.)

If you answered "yes" to Question 1 or Question 2 or Question 3 or Question 4, go on to answer Question 5, Question 6, and Question 7.)

**QUESTION 5:** Was the not reasonably safe condition of the product a proximate cause of injury or damage to plaintiff                      ?

ANSWER: YES X NO           

**QUESTION 6:** Was the not reasonably safe condition of the product a proximate cause of injury or damage to plaintiff                      ?

ANSWER: YES X NO           

**QUESTION 7:** Was the not reasonably safe condition of the product a proximate cause of injury or damage to plaintiff                      ?

ANSWER: YES X NO           

(If you answered "No" to Question 5 and Question 6 and Question 7, sign this verdict form.

If you answered "Yes" to Question 5, go on to answer Question 8.)

**QUESTION 8:** What do you find to be the plaintiff                      amount of damages?

\$ 15,000,000

(If you answered "Yes" to Question 6, answer Question 9.)

**QUESTION 9:** What do you find to be the plaintiff                      amount of damages?

\$ 18,000,000

(If you answered "Yes" to Question 6, answer Question 10.)

**QUESTION 10:** Did plaintiff [redacted] suffer a loss of consortium due to the injuries to plaintiff [redacted]?

ANSWER: YES X NO \_\_\_\_\_

(If you answered "Yes" to Question 10, answer Question 11. If you answered "No" to Question 10, go to Question 12.)

**QUESTION 11:** What do you find to be the plaintiff [redacted] amount of damages for loss of consortium?

\$ 150,000.<sup>00</sup>

(If you answered "Yes" to Question 7, answer Question 12.)

**QUESTION 12:** What do you find to be the plaintiff [redacted] amount of damages?

\$ 17,000,000

(If you answered yes to = Question 2 or Question 3 or Question 4 and awarded damages on Question 8, answer Question 13, otherwise go to Question 15.)

**QUESTION 13:** Should punitive damages be awarded against defendant in the case of plaintiff [redacted]?

ANSWER: YES X NO \_\_\_\_\_

(If you answered "Yes" to Question 13, answer Question 14. If you answered "No" to Question 13, go to Question 15.)

**QUESTION 14:** What do you find to be the appropriate amount of punitive damages to be awarded in the case of plaintiff [redacted]?

\$ 45,000,000

(If you answered yes to Question 2 or Question 3 or Question 4 and awarded damages on Question 9, answer Question 15, otherwise go to Question 17.)

**QUESTION 15:** Should punitive damages be awarded against defendant in the case of plaintiff [redacted]?

ANSWER: YES X NO \_\_\_\_\_

(If you answered "Yes" to Question 15, answer Question 16. If you answered "No" to Question 15, go to Question 17.)

**QUESTION 16:** What do you find to be the appropriate amount of punitive damages to be awarded in the case of plaintiff \_\_\_\_\_ ?

\$ 45,000,000

(If you answered yes to Question 2 or Question 3 or Question 4 and awarded damages on Question 12, answer Question 17, otherwise go to signature.)

**QUESTION 17:** Should punitive damages be awarded against defendant in the case of plaintiff \_\_\_\_\_ ?

ANSWER: YES X NO \_\_\_\_\_

(If you answered "Yes" to Question 17, answer Question 18. If you answered "No" to Question 17, sign this verdict form.)

**QUESTION 18:** What do you find to be the appropriate amount of punitive damages to be awarded in the case of \_\_\_\_\_ ?

\$ 45,000,000

DIRECTION: Please sign this Verdict Form and notify the bailiff.

7/27/21  
Date