

The Honorable Judge Douglass North

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

ALLISON

No. 18-2-26074-4 SEA

SPECIAL VERDICT FORM

Plaintiffs,

v.

PHARMACIA LLC, a Delaware limited
liability corporation,

Defendant.

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 X NO _____

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

ANSWER: YES X 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 X NO _____

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

ANSWER: YES X NO _____

(If you answered "No" to Question 1 and Question 2 and Question 3 and Question 4, sign and date 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 5: Was the not reasonably safe condition of the product a proximate cause of injury or damage to any of the following plaintiff(s)?

- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____
- _____ YES X NO _____

(If you answered "No" in response to all plaintiffs in Question 5, sign and date this verdict form and answer no more questions.

If you answered "Yes" to Question 5 in regard to plaintiff [redacted] go on to Question 6.

If you answered "Yes" to Question 5 in regard to plaintiff [redacted] go on to Question 7.

If you answered "Yes" to Question 5 in regard to plaintiffs [redacted] go Question 8.

If you answered "No" to Question 5 in regard to plaintiffs [redacted] but "Yes" in regard to at least one other plaintiff, go on to Question 9.)

QUESTION 6: Did plaintiff [redacted] suffer a loss of consortium due to the injuries to plaintiff [redacted] or a loss of society due to the injuries to plaintiffs [redacted]?

ANSWER: YES _____ NO X

QUESTION 7: Did plaintiff [redacted] suffer a loss of consortium due to the injuries to plaintiff [redacted] or a loss of society due to the injuries to plaintiffs [redacted]?

ANSWER: YES _____ NO X

QUESTION 8: Did plaintiff [redacted] suffer a loss of society due to the injuries to plaintiffs [redacted]?

ANSWER: YES _____ NO X

QUESTION 9: For each plaintiff for whom you answered "Yes" in Question 5, 6, 7, or 8 what do you find to be the amount of damages to compensate that plaintiff? Only answer this question for the plaintiff(s) for whom you answered "Yes" in Question 5, 6, 7 or 8.

ANSWER:

[redacted]	\$ <u>1,000,000</u>
[redacted]	\$ _____
[redacted]	\$ <u>8,000,000</u>
[redacted]	\$ <u>4,000,000</u>

Plaintiff 1 \$ 1,000,000
 Plaintiff 2 \$
 Plaintiff 3 \$ 8,500,000
 Plaintiff 4 \$ 8,500,000
 Plaintiff 5 \$ 1,000,000
 Plaintiff 6 \$
 Plaintiff 7 \$ 10,500,000
 Plaintiff 8 \$ 8,500,000
 Plaintiff 9 \$ 4,000,000

(If you answered "Yes" to Question 2 or Question 3 AND awarded damages on Question 9 to any plaintiff, answer Question 10, otherwise sign and date this verdict form and answer no more questions.)

QUESTION 10: For each plaintiff for whom you awarded damages in Question 9 due to a finding of liability on Question 2 or Question 3, should punitive damages be awarded against defendant in the case of that plaintiff? Only answer this question for the plaintiff(s) for whom you awarded damages in Question 9.

ANSWER:

Plaintiff 1 YES X NO
 Plaintiff 2 YES X NO
 Plaintiff 3 YES X NO
 Plaintiff 4 YES X NO
 Plaintiff 5 YES X NO
 Plaintiff 6 YES X NO
 Plaintiff 7 YES X NO
 Plaintiff 8 YES X NO
 Plaintiff 9 YES X NO

_____ YES X NO _____
 _____ YES X NO _____
 _____ YES X NO _____
 _____ YES X NO _____

(If you answered "Yes" in regard to a plaintiff in Question 9, answer Question 10. If you did not answer "Yes" for any plaintiff in Question 9, sign and date this verdict form and answer no more questions.)

QUESTION 11: For each Plaintiff for whom you answered "Yes" in Question 10, what do you find to be the appropriate amount of punitive damages to be awarded? Only answer this question for the plaintiff(s) for whom you answered "Yes" in Question 10.

ANSWER:

_____ \$ 4,000,000
 _____ \$ 32,000,000
 _____ \$ 16,000,000
 _____ \$ 4,000,000
 _____ \$ 34,000,000
 _____ \$ 34,000,000
 _____ \$ 4,000,000
 _____ \$ 42,000,000
 _____ \$ 34,000,000
 _____ \$ 16,000,000

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

OCT 13, 2022
Date