

**FILED**  
KING COUNTY, WASHINGTON

The Honorable James E. Rogers

JUL 17 2023

SUPERIOR COURT CLERK  
BY Tonya Hutchinson  
DEPUTY

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

CRYSTAL B. CLINGER, Individually and on behalf  
of PHARMACIA LLC, et al., and PHARMACIA  
LLC, et al., Plaintiffs, and  
BARBARA N. CALDWELL,

No. 18-2-54572-2 SEA

Plaintiffs,

**VERDICT FORM**

vs.

PHARMACIA LLC, a Delaware limited liability  
corporation;

Defendants.

**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

**ORIGINAL**

**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 ✓ NO \_\_\_\_\_

(If you answered "Yes" to Question 1 or Question 2 or Question 3 or Question 4, go on to answer Question 5. 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.)

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

[Blurred names of plaintiffs]

YES \_\_\_\_\_ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES ✓ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES ✓ NO \_\_\_\_\_

(If you answered "Yes" in response to one or more plaintiffs, proceed to Question 6. If you answered "No" in response to all plaintiffs in Question 5, sign and date this verdict form and answer no more questions.)

**QUESTION 6:** For each plaintiff for whom you answered "Yes" in Question 5, 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.

ANSWER: \$ \_\_\_\_\_  
\$ \_\_\_\_\_  
\$ \_\_\_\_\_  
\$ 10m \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ 2m

(If you answered "Yes" to Question 2 or Question 3 or Question 4 AND awarded damages on Question 6 to any plaintiff, answer Question 7. If not, sign the verdict form.

**QUESTION 7:** For each plaintiff for whom you awarded damages in Question 6, due to a finding of liability on Question 2, Question 3 or Question 4, 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 6.

ANSWER:

YES \_\_\_\_\_ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES  NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES \_\_\_\_\_ NO \_\_\_\_\_

YES  NO \_\_\_\_\_

(If you answered "Yes" in regard to a plaintiff in Question 7, answer Questions 8 and 9. If you did not answer "Yes" for any plaintiff in Question 7, go to Question 10.

**QUESTION 8:** If you answered "Yes" in regard to a plaintiff in Question 7, please identify which claim(s), if any, form the basis for your determination that punitive damages are appropriate?

Question 2 (Not reasonably safe as designed)  YES  NO \_\_\_\_\_

Question 3 (Failure to warn with product)  YES  NO \_\_\_\_\_

Question 4 (Failure to warn after sale)  YES  NO \_\_\_\_\_

**QUESTION 9:** For each Plaintiff for whom you answered "Yes" in Question 7, 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 7.

ANSWER:

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ 50m

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ 10m

**QUESTION 10:** Did \_\_\_\_\_ discover or in the use of reasonable diligence should she have discovered that PCBs caused her alleged harms prior to November 13, 2015?

ANSWER: YES \_\_\_\_\_

NO ✓

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

7/14/2003  
Date