

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

ANGELA B. HEIT, KATHLEEN BRONKHORST, as  
Personal Representatives for the ESTATE OF SANDRA  
K. BRONKHORST, KELLY A. MILLER, LAUREL J.  
NAYLOR, BRYAN C. CHRISTENSEN, DANIEL S.  
PERKINS, KATHERINE A. BROWN, and JENNIFER M.  
SILVERMAN,

Plaintiffs,

v.

PHARMACIA LLC;

Defendant.

No. 18-2-55641-4 SEA

**SPECIAL 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 as designed?

ANSWER: YES   NO

**QUESTION 2:** 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

**QUESTION 3:** 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

**ORIGINAL**

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

**QUESTION 4:** Was the not reasonably safe condition of the product a proximate cause of injury or damage to any of the following plaintiffs?

ANSWER:

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 "Yes" in response to one or more plaintiffs, proceed to Question 5. If you answered "No" in response to all plaintiffs in Question 4, sign and date this verdict form and answer no more questions.)

**QUESTION 5:** For each plaintiff for whom you answered "Yes" in Question 4, 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 4.

ANSWER:

\$ 5,865,000

\$ 6,805,000

\$ 4,605,000

\$ 5,815,000

\$ 5,865,000

\$ 6,335,000

\$ 4,705,000

\$ 4,300,000

\$ 5,515,000

(If you answered "Yes" to Question 1 or Question 2 AND awarded damages on Question 5 to any plaintiff, answer Question 6; otherwise go to Question 8.)

**QUESTION 6:** For each plaintiff for whom you awarded damages in Question 5, due to a finding of liability on Question 1 or Question 2, 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 5.

ANSWER:

YES  NO

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 6, answer Question 7. If you did not answer "Yes" for any plaintiff in Question 6, go to Question 8).

**QUESTION 7:** For each plaintiff for whom you answered "Yes" in Question 6, 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 6.

ANSWER:

\$ 15,111,5000

\$ 18,161,500

\_\_\_\_\_ \$ 14,711,500.  
 \_\_\_\_\_ \$ 15,111,500.  
 \_\_\_\_\_ \$ 17,301,500.  
 \_\_\_\_\_ \$ 11,111,500.  
 \_\_\_\_\_ \$ 9,951,500.  
 \_\_\_\_\_ \$ 13,811,500.

**QUESTION 8:** For each plaintiff for whom you answered "Yes" in Question 4, was the plaintiff harmed by the product within the useful safe life of the product?

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

**QUESTION 9:** Did the defendant intentionally misrepresent facts about its product, or intentionally conceal information about its product?

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

**QUESTION 10:** If you answered "Yes" to Question 9, was defendant's intentional misrepresentation about the product or intentional concealment of information about the product, the proximate cause of any plaintiff's injuries?

ANSWER: Angela B. Heit: YES X NO \_\_\_\_\_

- YES  NO
- YES  NO
- YES  NO
- YES  NO
- YES  NO
- YES  NO
- YES  NO

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

11/20/2023  
Date

