

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

ROSE

No. 18-2-58239-3 SEA

**SPECIAL VERDICT FORM**

Plaintiffs,

v.

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 (PCBs) that was not reasonably safe as designed?

ANSWER: YES  NO

**QUESTION 2:** Did the defendant supply a product (PCBs) that was not reasonably safe because adequate warnings or instructions were not provided with the product (PCBs)?

ANSWER: YES  NO

**ORIGINAL**



(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:

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

\$ 8,000,000

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

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

\$ 5,000,000

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

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

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

\$ 7,000,000

\$ 5,000,000

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

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

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

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

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

**QUESTION 6:** For each plaintiff for whom you answered "Yes" in Question 4, was the plaintiff harmed by the product (PCBs) within the useful safe life of the product (PCBs)?

ANSWER:

[Blurred text representing plaintiff names]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**QUESTION 7:** Did the defendant intentionally misrepresent facts about its product (PCBs) or intentionally conceal information about its product (PCBs)?

ANSWER:

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

**QUESTION 8:** If you answered "Yes" to Question 7, was defendant's intentional misrepresentation about the product (PCBs) or intentional concealment of information about the product (PCBs), the proximate cause of any plaintiff's injuries?

ANSWER:

[Blurred text area]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(If you answered "Yes" to Question 1 or Question 2 AND awarded damages on Question 5 to any plaintiff, answer Question 9, otherwise please sign and date this Verdict Form and answer no more questions.)

**QUESTION 9:** 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:

[Blurred text representing plaintiff names]

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

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

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

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

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

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

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

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 9, answer Question 10. If you did not answer "Yes" for any plaintiff in Question 9, please sign and date this Verdict Form and answer no more questions.)

**QUESTION 10:** For each Plaintiff for whom you answered "Yes" in Question 9, 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 9.

ANSWER:

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

\$ 24,000,000

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

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

\$ 15,000,000

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

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

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

\$ 21,000,000

\$ 15,000,000

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

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

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

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

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

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

1/14/2025  
Date