

MR. HENRY #4 FOREMAN

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KYLE ANDERSON,
SHANNON MOORE,

SPECIAL VERDICT

Plaintiffs,

vs.

STATE OF CALIFORNIA (CALTRANS),

Defendant.

We, the jury, answer the questions submitted to us as follows:

QUESTION 1: Was the southbound shoulder area of Broadway (U.S. 101) where the subject incident occurred in a dangerous condition at the time of the incident?

Yes No

12-0

If your answer to Question 1 is yes, then answer Question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 2: Did the dangerous condition create a reasonably foreseeable risk that this kind of incident would occur?

Yes No

12-0

If your answer to Question 2 is yes, then answer Question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 3: Did Heidi Quintrell or Matt Socha negligently exercise Caltrans'

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3-no

retained control over safety conditions at the All Phase worksite so as to create the dangerous condition?

X Yes _____ No

If your answer to Question 3 is yes, then answer Question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 4: Was the dangerous condition a substantial factor in causing harm to plaintiff Kyle Anderson or Shannon Moore?

X Yes _____ No

If your answer to Question 4 is yes, then answer Question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 5: What are Kyle Anderson's damages?

KYLE ANDERSON

- a. Medical Expenses
 - Past Medical expenses \$ 2,507,424.17
 - Future Medical Expenses \$ 17,803,186
- b. Lost Earnings
 - Past Lost earnings \$ 200,000
 - Future Lost earnings \$ 1,466,639

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11-1
(3-no)
(316-no)
10-2
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(3-no)

(NO-3,7)

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11-1 (3-NO)

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(3,NO)

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11-1

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c. Past non-economic loss, including physical paralysis and impairment; difficulty communicating, feeling of vulnerability and isolation, mental suffering; physical pain; loss of quality and enjoyment life

\$ 10,000,000

d. Future non-economic loss, including physical paralysis and impairment; difficulty communicating, feeling of vulnerability and isolation, mental suffering; physical pain; loss of quality and enjoyment life

\$ 25,000,000

QUESTION 6: What are Shannon Moore's damages?

SHANNON MOORE

a. Medical Expenses

Past Medical expenses

\$ 33,157.11

Future Medical Expenses

\$ 42,000

b. Lost Earnings

Past Lost earnings

\$ 226,201

Future Lost earnings

\$ 426,234

c. Past non-economic loss, including psychological injury and emotional distress, mental suffering, fear and anxiety, physical pain, loss of quality and enjoyment of life; Post Traumatic Stress Disorder (PTSD)

\$ 500,000

d. Future non-economic loss, including psychological injury and emotional distress, mental suffering, fear and anxiety, physical pain, loss of quality and enjoyment of life; Post Traumatic Stress Disorder (PTSD)

\$ 1,500,000

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(7, 12-400)

QUESTION 7: Was Selena Ranney negligent?

Yes No

If you answer Question 7 yes, then answer Question 8. If you answered no, then enter a zero next to Selena Ranney's name in Question 11, then move to Question 9.

QUESTION 8. Was Selena Ranney's negligence a substantial factor in causing harm to Kyle Anderson or Shannon Moore?

Yes No

If you answer Question 8 yes, then answer Question 9. If you answered no, then enter a zero next to Selena Ranney's name in Question 11, then move to Question 9.

QUESTION 9. Was All Phase negligent?

Yes No

If you answer Question 9 yes, then answer Question 10. If you answered no, then enter a zero next to All Phase's name in Question 11, then move to Question 11.

QUESTION 10. Was the negligence of All Phase a substantial factor in causing harm to Kyle Anderson or Shannon Moore?

Yes No

314-7BS

2-10

(3, 418-7BS)

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If you answer Question 10 yes, then answer Question 11. If you answered no, then enter a zero next to All Phase's name in Question 11, then answer question 11.

QUESTION 11: What percentage of responsibility for plaintiffs' harm do you assign to each of the following, if any?

Do not enter a percentage next to a party if you were already instructed to enter a zero next to that party's name.

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NO
NRB07
TO VOTER

Caltrans 100 %

Selena Ranney 0 %

All Phase 0 %

Total 100%

Dated: _____

Presiding Juror