

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT**

JAMES RAZO and  
SUSAN WEINMULLER,

Plaintiffs,

v.

CASE NO.: D-101-CV-2019-01495

NO EXIT FILM, LLC and BLACK LABEL  
MEDIA,

Defendants.

**SPECIAL VERDICT FORM**

We, the jury, hereby return the following verdict:

**Section A**

**Question No. 1:** Was Black Label Media negligent?

Answer: YES (Yes or No)

*If the Answer to Question No. 1 is "Yes," proceed to Question No. 2.*

*If the Answer to Question No. 1 is "No," proceed to Question No. 3. Do not answer Question No. 2.*

**Question No. 2:** Was any negligence of Black Label Media a cause of James Razo's injuries and damages?

Answer: YES (Yes or No)

*Proceed to Question No. 3.*

**Question No. 3:** Was No Exit Film negligent?

Answer: YES (Yes or No)

*If the Answer to Question No. 3 is "Yes," proceed to Question No. 4.*

*If the Answer to Question No. 3 is "No," proceed to Question No. 5. Do not answer Question No. 4.*

**Question No. 4:** Was any negligence of No Exit Film a cause of James Razo's injuries and damages?

Answer: YES (Yes or No)

Proceed to Section B.

**Section B**

Answer the questions below **only** if 1) you answered "Yes" to both Question No. 1 and Question No. 2; **or** 2) you answered "Yes" to both Question No. 3 and Question No. 4. If you did not answer "Yes" to both Question No. 1 and Question 2 **or** did not answer "Yes" to both Question 3 and Question 4, you are not to answer further questions. Your foreperson must sign this special verdict, which will be your verdict for Defendants and against Plaintiffs, and you all will return to open court.

**Question No. 5:** In accordance with the damage instructions given by the court, we find the total amount of damages suffered by James Razo to be

\$ 24,662,795.00

(here enter the total amount of damages without any reduction for comparative negligence)

Proceed to Question No. 6.

**Question No. 6:** In accordance with the damage instructions given by the court, we find the total amount of loss of consortium damages suffered by Susan Weinmuller to be

\$ 6,000,000

(here enter the total amount of damages without any reduction for comparative negligence)

Proceed to Question No. 7.

**Question No. 7:** Compare the negligence of the following persons and find a percentage for each. The total of the percentages must equal 100%, but the percentage for any one or more of the persons named may be zero if you find that such person was not negligent or that any negligence on the part of such person was not a cause of damage.

Black Label Media	<u>63</u>	%
No Exit Film	<u>18</u>	%
James Razo	<u>19</u>	%
	<b>100% TOTAL</b>	

The court will multiply the percentage of negligence attributed to each defendant times the plaintiffs' damages as found by the jury under Question Nos. 5 and 6. The court will then enter judgment for plaintiffs against each defendant in that amount.

*Proceed to Question No. 8.*

**Question No. 8:** If you find, in accordance with the instructions from the Court, that punitive damages should be awarded in this case, set forth the amount below:

Punitive Damages Against Black Label Media	\$ <u>27,000,000</u>
Punitive Damages Against No Exit Film	\$ <u>9,000,000</u>

*Proceed to Question No. 9.*

**Question No. 9:** Was James Razo an employee of No Exit Film?

Answer: NO (Yes or No)

Scott Mayer  
JURY FOREPERSON