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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE, PALM SPRINGS**

Denise Collins and Christopher Collins

Case No: PSC1901096

Plaintiffs,

SPECIAL VERDICT

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

v.

JUL 27 2022

Diamond Generating Corporation,

M. Youngberg 

Defendant.

10 We the jury in the above-entitled action answer the questions submitted to us as follows:

11 1. Did Diamond Generating Corporation voluntarily, or for a charge render services related to
12 Sentinel Energy Center worker safety?

13 ✓ YES NO

14
15 If you answered "YES" for question 1, then answer question 2. If you answered "NO", stop here,
16 answer no further questions and have the presiding juror sign and date this form.

17 2. Were the services rendered of the kind that Diamond Generating Corporation should have
18 recognized as needed for the protection of workers at the Sentinel Energy Center?

19 ✓ YES NO

20 If you answered "YES" to question 2, then answer question 3. If you answered "NO", stop here, answer
21 no further questions, and have the presiding juror sign and date this form.

22 3. Did Diamond Generating Corporation fail to exercise reasonable care in rendering those
23 services?

24 ✓ YES NO

25 If you answered "YES" to question 3, then answer question 4. If you answered "NO", stop here,
26 answer no further questions, and have the presiding juror sign and date this form.

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4. Was Diamond Generating Corporation's failure to exercise reasonable care a substantial factor in causing the death of Daniel Collins?

YES NO

If you answered "YES" to question 4, then answer questions 5, 6 and 7. If you answered "NO", stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Diamond Generating Corporation's failure to use reasonable care add to the risk of harm to Sentinel Energy Center workers?

YES NO

Answer question 6

6. Were Diamond Generating Corporation's services related to Sentinel Energy worker safety rendered to perform a duty that DGC Operations owed to the workers at Sentinel Energy Center, including Daniel Collins?

YES NO

Answer question 7.

7. Was Daniel Collins killed because DGC Operations relied on Diamond Generating Corporation's services related to Sentinel Energy worker safety?

YES NO

If you answered "YES" TO ANY OF QUESTIONS 5, 6, OR 7, answer the following questions:

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8. What are Denise Collins **PAST** non-economic damages for the loss of her husband Daniel Collins from March 7, 2017 to present?

For the loss of Love, Companionship, Comfort, Care, Assistance, Protection, Affection, Society, Moral Support, Training and Guidance and the loss of the enjoyment of Sexual relations?

\$ 5,000,000

9. What are Denise Collins **FUTURE** non-economic damages for the loss of her husband Daniel Collins from today forward?

For the loss of Love, Companionship, Comfort, Care, Assistance, Protection, Affection, Society, Moral Support, Training and Guidance and the loss of the enjoyment of Sexual relations?

\$ 54,000,000

10. What are Christopher Collins **PAST** non-economic damages for loss of his father Daniel Collins from March 7, 2017 to present?

For the loss of Love, Companionship, Comfort, Care, Assistance, Protection, Affection, Society, Moral Support, and the loss of Daniel Collins' Training and Guidance?

\$ 10,000,000

11. What are Christopher Collins **FUTURE** non-economic damages for loss of his father Daniel Collins from today forward?

For the loss of Love, Companionship, Comfort, Care, Assistance, Protection, Affection, Society, Moral Support, and the loss of Daniel Collins' Training and Guidance?

\$ 81,000,000

1 After answering questions 8, 9, 10, and 11, Answer question 12.

2
3 12. Was Mott McDonald negligent?

4 _____ YES NO

5 If you answered question 12, "YES", answer question 13. If you answered "NO", go to question 14.

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7 13. Was Mott McDonald's negligence a substantial factor in causing his death?

8 _____ YES _____ NO

9
10 Answer question 14.

11 14. Was Sentinel Energy Center, LLC negligent?

12 _____ YES NO

13 If you answered question 14, "YES", answer question 15. If you answered "NO", go to question 16.

14
15 15. Was Sentinel Energy Center, LLC's negligence a substantial factor in causing his death?

16 _____ YES _____ NO

17
18 Answer question 16.

19 16. Was DGC Operations, LLC negligent?

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21 YES _____ NO

22 If you answered question 16, "YES", answer question 17. If you answered "NO", go to question 18.

23
24 17. Was DGC Operations, LLC's negligence a substantial factor in causing his death?

25 YES _____ NO

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1 Answer question 18.

2

3 18. Was CPV Sentinel Management, LLC negligent?

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5 YES NO

6 If you answered question 18, "YES", answer question 19. If you answered "NO", go to question 20.

7 19. Was CPV Sentinel Management, LLC's negligence a substantial factor in causing his death?

8

9 YES NO

10 Answer question 20.

11 20. Was Daniel Collins negligent?

12

13 YES NO

14 If you answered question 20, "YES", answer question 21. If you answered "NO", go to question 22.

15 21. Was Daniel Collins' negligence a substantial factor in causing his own death?

16

17 YES NO

18 22. What percentage of responsibility for Daniel Collins' death do you assign to the following:
19 [Please only assign a percentage to a party, entity, or individual you found was both negligent
20 AND their negligence was a substantial factor in Daniel Collins Death]

21	Defendant Diamond Generating Corporation	<u>97</u>	%
22	Mott McDonald	<u>0</u>	%
23	Sentinel Energy Center, LLC	<u>0</u>	%
24	DGC Operations, LLC	<u>2</u>	%
25	CPV Sentinel Management, LLC	<u>0</u>	%
26	Daniel Collins	<u>1</u>	%
27	TOTAL		100 %

28 Dated 7/27/2022


Foreperson