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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

ARTHUR PUTT and JANET PUTT, ) Case Nos. JCCP4674 / 18STCV06912  
Plaintiffs, )  
vs. ) **SPECIAL VERDICT FORM**  
FORD MOTOR COMPANY ) Dept.: 41; Hon. Stephen M. Moloney  
Defendant. )  
\_\_\_\_\_ )

We, the jury in the above-entitled action, find the following Special Verdict on the questions submitted to us:

///  
///

1 PRODUCTS LIABILITY – CONSUMER EXPECTATION

2  
3 **Question No. 1:** Did Ford Motor Company's product(s) fail to perform as safely as an ordinary  
4 consumer would have expected?

5  
6 Yes  No

7  
8 If your answer to question 1 is "yes," answer question 2. If you answered "no" to this question, go  
9 to question 4.

10  
11 **Question No. 2:** Was Ford Motor Company's product(s) used in a way that was reasonably  
12 foreseeable to Ford Motor Company?

13  
14 Yes  No

15  
16 If your answer to question 2 is "yes," answer question 3. If you answered "no" to this question, go  
17 to question 4.

18  
19  
20 **Question No. 3:** Was the failure of Ford Motor Company's product(s) to perform as safely as an  
21 ordinary consumer would have expected a substantial factor in causing harm to Arthur Putt?

22  
23 Yes  No

24  
25 Answer Question No. 4.

10-2  
No: Juror 7, 12

1 PRODUCTS LIABILITY – FAILURE TO WARN

2  
3 **Question No. 4:** Did Ford Motor Company's product(s) have potential risks that were known or  
4 knowable through the generally recognized and prevailing best scientific and medical knowledge  
5 available at the time of manufacture, distribution or sale?

6  
7 Yes  No  12-0

8  
9 If your answer to question 4 is "yes," answer question 5. If you answered "no" to this question, go  
10 to question 9.

11  
12 **Question No. 5:** Did the potential risks present a substantial danger to persons using the products  
13 in the same manner as Mr. Putt?

14  
15 Yes  No  10-2

16  
17 If your answer to question 5 is "yes," then answer question 6. If you answered "no" to this  
18 question, go to question 9.

19  
20  
21 **Question No. 6:** Would ordinary consumers have failed to recognize the potential risks?

22  
23 Yes  No  12-0

24  
25 If your answer to question 6 is "yes," then answer question 7. If you answered "no" to this  
26 question, go to question 9.

1 Question No. 7: Did Ford Motor Company fail to adequately warn of the potential risks?

2  
3  
4

Yes  No

12-0

5 If your answer to question 7 is "yes," then answer question 8. If you answered "no" to this  
6 question, go to question 9.

7

8 Question No. 8: Was the lack of sufficient warnings by Ford Motor Company a substantial factor  
9 in causing harm to Arthur Putt?

10  
11

Yes  No

11-1

12  
13

Answer Question No. 9.

14

15 PRODUCTS LIABILITY - NEGLIGENCE

16

17 Question No. 9: Was Ford Motor Company negligent in manufacturing, supplying, or failing to  
18 warn of their product(s)?

19  
20

Yes  No

21 If your answer to question 9 is "yes," then answer question 10. If your answer is "no" to this  
22 question, answer question no. 11.

23  
24  
25

12-0

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1 **Question No. 10:** Was Ford Motor Company's negligence a substantial factor in causing harm to  
2 Arthur Putt?

3  
4 Yes  No

10-2

5  
6 Answer question 11.

7  
8 **NEGLIGENCE - FAILURE TO RECALL**

9  
10 **Question No. 11:** Did Ford Motor Company know or should they reasonably have known that  
11 their product(s) were dangerous or likely to be dangerous when used in a reasonably foreseeable  
12 manner?

13 Yes  No

12-0

14  
15 If your answer to question 11 is "yes," then answer question 12. If you answered "no" to this  
16 question, and also answered "no" to, or didn't answer, questions 3, 8, and 10 stop here, answer no  
17 further questions, and have the presiding juror sign and date this form. If you answered "no" to  
18 this question, but answered "yes" to questions 3, 8, or 10, go to question 16.

19  
20 **Question 12:** Did Ford Motor Company become aware of this defect after the product was sold?

21  
22 Yes  No

12-0

23  
24 If your answer to question 12 is "yes," then answer question 13. If you answered "no" to this  
25 question, and also answered "no" to, or didn't answer, questions 3, 8, and 10 stop here, answer no  
26 further questions, and have the presiding juror sign and date this form. If you answered "no" to

1 this question, but answered "yes" to questions 3, 8, or 10, go to question 16.

2  
3 **Question 13:** Did Ford Motor Company fail to recall, or warn of the danger of its products?

4  
5 Yes  No  12-0

6  
7 If your answer to question 13 is "yes," then answer question 14. If you answered "no" to this  
8 question, and also answered "no" to, or didn't answer, questions 3, 8, and 10 stop here, answer no  
9 further questions, and have the presiding juror sign and date this form. If you answered "no" to  
10 this question, but answered "yes" to questions 3, 8, or 10, go to question 16.

11  
12 **Question 14:** Would a reasonable manufacturer or distributor under the same or similar  
13 circumstances have recalled, or warned about the product?

14  
15 Yes  No  12-0

16  
17 If your answer to question 14 is "yes," then answer question 15. If you answered "no" to this  
18 question, and also answered "no" to, or didn't answer, questions 3, 8, and 10 stop here, answer no  
19 further questions, and have the presiding juror sign and date this form. If you answered "no" to  
20 this question, but answered "yes" to questions 3, 8, or 10, go to question 16.

21  
22 **N/A** Yes  No

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**Question 15:** Was Ford Motor Company's failure to recall, or warn about the product a substantial factor in causing harm to Arthur Putt?

Yes  No  10-2

If your answer to question 15 is "yes," then answer question 16. If you answered "no" to this question, and also answered "no" to, or didn't answer, questions 3, 8, and 10 stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered "no" to this question, but answered "yes" to questions 3, 8, or 10, go to question 16.

**DAMAGES**

**Question No. 16:** What are Plaintiffs' TOTAL damages?

<b>ECONOMIC DAMAGES</b>	\$ <u>500,000</u>
<b>ARTHUR PUTT'S PAST NON-ECONOMIC DAMAGES</b>	\$ <u>2,000,000</u>
<b>ARTHUR PUTT'S FUTURE NON-ECONOMIC DAMAGES</b>	\$ <u>2,000,000</u>
<b>TOTAL</b>	\$ <u>2,500,000</u>

Answer Question No. 17. 12-0



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**Question 15:** Was Ford Motor Company's failure to recall, or warn about the product a substantial factor in causing harm to Arthur Putt?

Yes  No

If your answer to question 15 is "yes," then answer question 16. If you answered "no" to this question, and also answered "no" to, or didn't answer, questions 3, 8, and 10 stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered "no" to this question, but answered "yes" to questions 3, 8, or 10, go to question 16.

**DAMAGES**

**Question No. 16:** What are Plaintiffs' TOTAL damages?

ECONOMIC DAMAGES	\$ 500,000
ARTHUR PUTT'S PAST NON-ECONOMIC DAMAGES	\$ 2,000,000
ARTHUR PUTT'S FUTURE NON-ECONOMIC DAMAGES	\$ 2,000,000
TOTAL	<del>\$ 2,500,000</del> 4,500,000

Answer Question No. 17.





1 Question No. 17: What is the TOTAL AMOUNT of loss of consortium damages, if  
2 any, suffered, or to be suffered, by Janet Putt as a result of Arthur Putt's mesothelioma?

3 PAST \$ 2,000,000

4 FUTURE \$ 2,000,000

5 Answer Question No. 18.

6 12-0

7 Question No. 18: If 100% represents the total fault that was the cause of Arthur Putt's injuries,  
8 what part of that 100% was due to the fault of Ford, and what percentage of this 100% was due to  
9 the fault, if any, of the other entities listed below?

10 Ford Motor Company, Inc.

11 100 %

9-3

12 Arthur Putt's employers (Standard Oil, Chevron, Exxon)

0 %

11-10-12

13 Other automakers (Chevrolet, Chrysler)

0 %

9-3

14 Manufacturers or suppliers of replacement brakes

No #2, #11, #12

15 (NAPA and Pep Boys, as sellers of Bendix, Pneumo Abex products)

0 %

10-2

16 TOTAL 100%

#11, #12

17 → No:

#2

#11

#12

18 Answer Question No. 19.

19 9-3

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Question 19: Do you find by clear and convincing evidence that a Ford officer, director or managing agent acted with malice, oppression, or fraud toward Arthur Putt?

Yes  No

12-0

Please sign and date this verdict.

DATED: 8/29/19

Najia El-Shafie  
Presiding Juror