

FILED
Superior Court of California
County of Los Angeles

JUL 21 2017

Sherri R. Carter, Executive Officer/Clerk
By Felipe Rojas Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

HILARIO CRUZ, an individual,
Plaintiff,
v.
NISSAN NORTH AMERICA,
Defendant.

CASE NO. BC493949
[Consolidated with Case Nos. BC529912
and BC577815]
Assigned to: Hon. Randolph M. Hammock
Dept.: 47

SPECIAL INTERROGATORIES

AND ALL RELATED ACTIONS.

We answer the questions submitted to us as follows:

1. Before April 16, 2013, did Hilario Cruz know of facts that would have caused a reasonable person to suspect that he had suffered harm that was caused by an alleged problem in the braking system of the 2004 QX56 being driven by Solomon Mathenge at the time of the crash?

Yes _____

No X

If you answer this question "Yes," answer the next Question (No. 2). If you answer this question "No," skip Question No. 2. Answer Question No. 3.

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2. Would a reasonable and diligent investigation have disclosed before April 16, 2013 that an alleged problem in the braking system of the 2004 QX56 being driven by Solomon Mathenge at the time of the crash contributed to Hilario Cruz' harm?

Yes _____ No _____

Go to the next Question. (No. 3).

3. Before February 18, 2013 did Solomon Mathenge know of facts that would have caused a reasonable person to suspect that he had suffered harm that was caused by an alleged problem in the braking system of the automobile (2004 QX56) being driven by him at the time of the crash?

Yes _____ No X _____

If you answer this question "Yes," answer the next Question (No. 4). If you answer this question "No," skip Question No. 4.

4. Would a reasonable and diligent investigation have disclosed before February 18, 2013 that an alleged problem with the 2004 QX56's braking system contributed to Solomon Mathenge's harm?

Yes _____ No _____

Signed: _____


Presiding Juror

Dated: _____

7/21/17

After this form has been signed, notify the court attendant that you are ready to present your verdict in the courtroom, if the Special Verdict Form has also been signed.