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5 **Attorneys for Plaintiff(s),**
[CLIENT'S NAME]

6 [LAW FIRM NAME]
7 [ATTORNEY'S NAME] (State Bar No. [#])
[Street Address]
8 [City, State & Zip Code]
Telephone: [xxx.xxx.xxxx]
9 Facsimile: [xxx.xxx.xxxx]

10 **Attorneys for Defendant(s),**
[DEFENDANT'S NAME]

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF [COUNTY], [DISTRICT]**

14

15 [PLAINTIFF(S)], an individual,
16 Plaintiff,
17 vs.
18 [DEFENDANT(S)], and DOES 1 to [#],
inclusive,
19 Defendants.

Case No. []

SPECIAL VERDICT FORM

FSC Date: []
Trial Date: []

20

21 **SPECIAL VERDICT FORM**

22 We, the jury in the above entitled action, answer the questions submitted to us as
23 follows:

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25 1. Was Defendant [Defendant's Name] negligent in the operation of [his/her] vehicle
26 with regard to the subject accident?

27 Yes No

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If you answered "Yes" to Question No. 1, please continue to Question No. 2.

If you answered "No" to Question No. 1, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Was Defendant [Defendant's Name]'s negligence a substantial factor in causing injuries and/or damages to Plaintiff [Client's Name]?

_____ Yes _____ No

If you answered "Yes" to Question No. 2, please continue to Question No. 3.

If you answered "No" to Question No. 2, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. What do you find the total amount of damages, if any, for Plaintiff [Client's Name] to be? This includes economic and non-economic damages. Do not reduce these damages based on the fault, if any, of others.

Special Damages:

(A) Past economic loss

Lost earnings \$ _____

Medical expenses \$ _____

Other past economic loss \$ _____

(B) Future economic loss

Lost earnings \$ _____

Medical expenses \$ _____

Other future economic loss \$ _____

General Damages:

(A) Past noneconomic loss

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Physical pain/mental suffering \$ _____

(B) Future noneconomic loss

Physical pain/mental suffering \$ _____

If Plaintiff has proved more likely than not any damages, which you have listed above, please continue to Question No. 4.

If Plaintiff has not proved any damages, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Plaintiff [Client's Name] negligent?

_____ Yes _____ No

If your answer to Question No. 4 is "Yes," then answer Question No. 5.

If you answered "No," then insert the number zero next to Plaintiff's name in Question No. 6.

5. Was Plaintiff [Client's Name]'s negligence a substantial factor in causing [his/her] harm?

_____ Yes _____ No

If your answer to Question No. 5 is "Yes," please answer Question No. 6.

If you answered "No," insert the number zero next to Plaintiff's name in Question No. 6.

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///

1 6. Assuming that 100% represents the total negligence, fault and wrongful conduct
2 which, when combined, equals the total substantial factors of Plaintiff [Client's
3 Name]'s injuries and/or damages, what percentage of responsibility for Plaintiff's
4 harm do you assign to each of the following?
5

6 **Defendant** [Defendant's Name]: _____ %
7 **Plaintiff** [Client's Name]: _____ %
8 **TOTAL:** 100 %
9

10 Dated: _____ Signed: _____
11 Presiding Juror

12 After this verdict form has been signed, notify the clerk/bailiff/court attendant that
13 you are ready to present your verdict in the courtroom.
14

15 DATED: May 23, 2018 **SELARZ LAW CORP.**

17 By: _____
18 Daniel E. Selarz, Esq.
19 **Attorneys for Plaintiff(s),**
20 [Client's Name(s)]
21

22 DATED: May 23, 2018 **[FIRM NAME]**

23 By: _____
24 [Attorney's Name], Esq.
25 **Attorneys for Defendant(s),**
26 [Defendant's Name(s)]
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