

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAR 11 2008

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

CRYSTAL BEAR, by and through
her Guardian Ad Litem, Gary
N. Bloom,

NO. CV-05-253-EFS

Plaintiff,

v.

SPECIAL VERDICT FORM

FORD MOTOR COMPANY, a
Delaware corporation; and
MARLA BEAR MOTTESHARD, a
single person,

Defendants.

The following questions must be answered in the order that they are presented. We, the jury, answer the questions submitted to us as follows:

Question No. 1:

Did Defendant Ford Motor Company supply a product that was not reasonably safe as designed with respect to stability and handling?

Yes _____ No X

Question No. 2:

Did Defendant Ford Motor Company supply a product that was not reasonably safe as designed with respect to the rear seat restraint system?

Yes _____ No X

Question No. 3:

Were Plaintiff's parents, Steven and/or Joy Bear, negligent?

Yes _____ No X

If you answered "Yes" to Question No. 1, then proceed to Question No. 4. If you answered "Yes" to Question No. 2, then proceed to Question No. 5. If you answered "Yes" to Question No. 3, then proceed to Question No. 6. If you answered "No" to Question Nos. 1, 2, and 3, then proceed to Question No. 7.

Question No. 4:

If you answered "Yes" to Question No. 1, then answer the following:

Was the unsafe condition of the product with respect to stability and handling a proximate cause of Plaintiff's injuries?

Yes _____ No _____

Question No. 5:

If you answered "Yes" to Question No. 2, then answer the following:

Was the unsafe condition of the product with respect to the rear seat restraint system a proximate cause of Plaintiff's injuries?

Yes _____ No _____

Question No. 6:

If you answered "Yes" to Question No. 3, then answer the following:

Was Steven and/or Joy Bear's negligence a proximate cause of Plaintiff's injuries?

Yes _____ No _____

Question No. 7:

You have been instructed that Defendant Marla Bear Motteshard was negligent.

Was Defendant Motteshard's negligence a proximate cause of Plaintiff's injuries?

Yes X No

If you answered "Yes" to Question Nos. 4 or 5 or 6 or 7, then proceed to Question No. 8. If you answered "No" to Question Nos. 4, 5, 6, and 7, then stop here, answer no further questions, and have the presiding juror sign and return this verdict.

Question No. 8:

What is the amount of Plaintiff's damages?

Past Economic Damages: \$344,488.42

Future Economic Damages: \$ 5,555,511.58

Non-economic Damages: \$ 115,200.00

Question No. 9:

Assume that 100% represents the total combined fault that proximately caused Plaintiff's injuries and damages. What percentage of this 100% is attributable to each person(s) or entity, if any, whose fault was found by you in Question Nos. 4, 5, and 6 to have been a proximate cause of Plaintiff's injuries and damages? Your total must equal 100%.

Defendant Marla Bear Motteshard	<u>100</u> %
Defendant Ford Motor Company	<u>0</u> %
Steven and/or Joy Bear	<u>0</u> %
TOTAL	<u>100</u> %

Dated this 11th day of March 2008.

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