



IN THE CIRCUIT COURT, FOURTH  
JUDICIAL CIRCUIT, IN AND FOR  
DUVAL COUNTY, FLORIDA

CASE NO.: [REDACTED]

DIVISION: [REDACTED]

[REDACTED]  
[REDACTED] as  
[REDACTED] wife,  
[REDACTED], and  
[REDACTED], by and through  
his parent and guardian,  
[REDACTED]

Plaintiffs,

vs.

[REDACTED]  
[REDACTED] and  
[REDACTED]

Defendants.

**VERDICT FORM**

We, the jury, return the following verdict:

1. Was there negligence in providing care and treatment on the part of [REDACTED] or its employees, which was a legal cause of loss, injury, or damage to [REDACTED] ?

YES  NO

2. Was there negligence in providing care and treatment on the part of \_\_\_\_\_, which was a legal cause of loss, injury, or damage to \_\_\_\_\_ ?

YES  NO

3. Was there a failure of \_\_\_\_\_ to assure the competence of \_\_\_\_\_ through careful selection and review, which was a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES  NO

4. Was there a failure of \_\_\_\_\_ to assure comprehensive risk management of \_\_\_\_\_, which was a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES  NO

5. Was there false advertising under Chapter 817 on the part of \_\_\_\_\_, which was a legal cause of loss, injury, or damage to \_\_\_\_\_ ?

YES  NO

6. Were there any statements, oral, written, printed, or otherwise made by \_\_\_\_\_, which it knew or should have known, were untrue or misleading, and made with the intent or purpose, either directly or indirectly, of selling a service to \_\_\_\_\_ and which were a legal cause of loss, injury or damage to \_\_\_\_\_ ?

YES  NO

7. Was there a fraud or a misrepresentation by \_\_\_\_\_ relied on by \_\_\_\_\_, which was a legal cause of loss, injury, or damage to \_\_\_\_\_ ?

YES  NO \_\_\_\_\_

If your answer to questions 1 - 7 are all "No", then skip to question 15. If you answered any of the questions 1 - 7 "Yes" then please proceed to the following questions.

8. Did \_\_\_\_\_ act in a partnership with \_\_\_\_\_ or \_\_\_\_\_ with regard to \_\_\_\_\_'s care, which was a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES  NO \_\_\_\_\_

9. Did \_\_\_\_\_ act in a joint venture with \_\_\_\_\_ or \_\_\_\_\_ with regard to \_\_\_\_\_'s care, which was a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES  NO \_\_\_\_\_

10. Did \_\_\_\_\_ or \_\_\_\_\_ act as an agent of \_\_\_\_\_ with regard to \_\_\_\_\_'s care, which was a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES  NO \_\_\_\_\_

11. Did \_\_\_\_\_ or \_\_\_\_\_ act as an apparent agent of \_\_\_\_\_ with regard to \_\_\_\_\_'s care, which was a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES   ✓   NO \_\_\_\_\_

12. Do you find that in providing services to \_\_\_\_\_ was acting under the terms of the contract signed by the \_\_\_\_\_ on \_\_\_\_\_ with \_\_\_\_\_ and those services were a legal cause of loss injury or damage to \_\_\_\_\_ ?

YES   ✓   NO \_\_\_\_\_

13. State the percentage of any negligence or fault, which was a legal cause of loss, injury, damage, to \_\_\_\_\_ that you charge to:

DO NOT ANSWER THIS QUESTION (13) IF YOUR ANSWER TO QUESTION #2 IS "NO".

\_\_\_\_\_   60   %

\_\_\_\_\_   40   %

Total must be 100%

Proceed to question 14.

In determining the amount of damages, do not make any reduction because of the negligence, if any, of other parties. If you find that [REDACTED] was negligent or at fault, the Court in entering judgment will make an appropriate reduction in the damages awarded.

14. Please Answer the Following Questions on Damages.

**DAMAGES FOR [REDACTED]**

**EARNINGS**

- a. What is the total amount of [REDACTED]'S damages for lost earnings and benefits in the past? \$ 271,340
- b. What is the total amount of [REDACTED]'S damages for loss of earning capacity and benefits in the future? \$ 1,662,309

**MEDICAL EXPENSES**

- c. What is the total amount of [REDACTED]'S damages for medical expenses and other care needs incurred in the past? \$ 1,105,708
- d. What is the total amount of [REDACTED]'S damages for medical expenses and other care needs to be incurred in the future? \$ 10,500,000

**HOUSEHOLD SERVICES**

e. What is the total amount of the loss of household services legally caused by [redacted] 'S injuries incurred in the past? \$ 58,000

f. What is the total amount the loss of household services legally caused by [redacted] 'S injuries to be incurred in the future? \$ 233,000

**HUMAN DAMAGES**

g. What is the total amount of [redacted] 'S damages for pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, aggravation of a disease or physical defect and loss of capacity for the enjoyment of life sustained in the past? \$ 7,000,000

h. What is the total amount of [redacted] 'S damages for pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, aggravation of a disease or physical defect and loss of capacity for the enjoyment of life to be sustained in the future? \$ 54,000,000

**DAMAGES OF** [REDACTED]

i. What is the total amount of damage sustained by [REDACTED] in the past loss of her husband's comfort, society, and attention? \$ 5,000,000

j. What is the total amount of damage sustained by [REDACTED] in future loss of her husband's comfort, society, and attention? \$ 35,000,000

**DAMAGES OF** [REDACTED]

k. What is the total amount of damage sustained by [REDACTED] in the past loss of her father's comfort, companionship and society? \$ 1,000,000

l. What is the total amount of damage sustained by [REDACTED] in the future loss of her father's comfort, companionship and society? \$ 7,000,000

**DAMAGES OF** [REDACTED]

m. What is the total amount of damage sustained by [REDACTED] in the past loss of his father's comfort, companionship and society? \$ 1,000,000

n. What is the total amount of damage sustained by [REDACTED] in the future loss of his father's comfort, companionship and society? \$ 7,000,000

15. Was there neglect as defined in Chapter 415 on the part of \_\_\_\_\_  
or its employees, of \_\_\_\_\_ after he went into a coma on  
\_\_\_\_\_, which was a legal cause of loss, injury, or damage to \_\_\_\_\_  
\_\_\_\_\_ ?

YES  NO

If you answer "Yes" to question 15, then answer question 15a and 16. If you answer "No" to question 15, but answered any of 1-7 "Yes" then proceed to question 16.

If your answers to 1 - 7 and 15 are all "No", then your Verdict is for \_\_\_\_\_  
and against the \_\_\_\_\_ and you should sign and date this Verdict Form  
and return it to the Judge.

15a. Please Answer the Following Questions on Damages that occurred after the date  
\_\_\_\_\_ went into a coma on \_\_\_\_\_.

**DAMAGES FOR** \_\_\_\_\_

**EARNINGS**

b. What is the total amount of \_\_\_\_\_  
\_\_\_\_\_ 'S damages for lost  
earnings and benefits in the past? \$ 0

c. What is the total amount of \_\_\_\_\_  
\_\_\_\_\_ 'S damages for loss  
of earning capacity and benefits in the  
future? \$ 0



**MEDICAL EXPENSES**

d. What is the total amount of [redacted]'S damages for medical expenses and other care needs incurred in the past? \$ 18,100

e. What is the total amount of [redacted]'S damages for medical expenses and other care needs to be incurred in the future? \$ 20,000

**HOUSEHOLD SERVICES**

f. What is the total amount of the loss of household services legally caused by [redacted]'S injuries incurred in the past? \$ 0

g. What is the total amount the loss of household services legally caused by [redacted]'S injuries to be incurred in the future? \$ 0

**HUMAN DAMAGES**

h. What is the total amount of [redacted]'S damages for pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, aggravation of a disease or physical defect and loss of capacity for the enjoyment of life sustained in the past? \$ 0

i. What is the total amount of \_\_\_\_\_  
\_\_\_\_\_'S damages for pain  
and suffering, disability, physical  
impairment, disfigurement, mental  
anguish, inconvenience, aggravation of a  
disease or physical defect and loss of  
capacity for the enjoyment of life to be  
sustained in the future?

\$ 25,000,000

**DAMAGES OF** \_\_\_\_\_

j. What is the total amount of damage  
sustained by \_\_\_\_\_ in  
the past loss of her husband's comfort,  
society, and attention?

\$ 0

k. What is the total amount of damage  
sustained by \_\_\_\_\_ in  
future loss of her husband's comfort,  
society, and attention?

\$ 12,500,000

16. Under the circumstances of this case do you find by clear and convincing evidence  
that punitive damages are warranted against \_\_\_\_\_ ?

YES  NO

SO SAY WE ALL, this \_\_\_\_\_ of \_\_\_\_\_

  
FOREPERSON