

IN THE IOWA DISTRICT COURT IN AND FOR BENTON COUNTY

TROY RANDALL, INDIVIDUALLY AND)	
AS EXECUTOR OF THE ESTATE OF)	
TRISTON RANDALL,)	No. 009375
)	
Plaintiffs,)	PLAINTIFFS' PROPOSED STATEMENT
)	OF THE CASE, JURY INSTRUCTIONS
v.)	AND VERDICT FORM
)	
DENNIS ARY AND SANDRA ARY, CO-)	
ADMINISTRATORS OF THE ESTATE OF)	
QUENTIN RAY ARY; THE ESTATE OF)	
QUENTIN RAY ARY; JACK YOUDE; AND)	
VAN-HOF TRUCKING, INC.,)	
)	
Defendants.)	

Plaintiffs hereby submit their Proposed Jury Instructions and Verdict Form.

/s/ Vernon P. Squires

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of this document was served upon the persons listed on this document at the addresses indicated by EDMS electronic notification or by enclosing the same in an envelope with postage fully paid and by depositing said envelope in a United States Post Office depository this 27th day of August, 2018. I declare under penalty of perjury that the foregoing is true and correct.

/s/ Megan E. O'Connell

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AS EXECUTOR OF THE ESTATE OF)	
TRISTON RANDALL,)	No. 009375
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Plaintiffs,)	STATEMENT OF THE CASE AND JURY
)	INSTRUCTIONS
v.)	
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DENNIS ARY AND SANDRA ARY, CO-)	
ADMINISTRATORS OF THE ESTATE OF)	
QUENTIN RAY ARY; THE ESTATE OF)	
QUENTIN RAY ARY; JACK YOUDE; AND)	
VAN-HOF TRUCKING, INC.,)	
)	
Defendants.)	

STATEMENT OF THE CASE

Members of the Jury:

This case arises from a motor vehicle collision on April 9, 2015, in Urbana, Iowa that resulted in the deaths of five people. One of those killed was Triston Randall. Triston was a passenger in a pick-up truck driven by Quentin Ary, who also died. The Ary vehicle collided with a tractor-trailer driven by Jack Youde on behalf of Van-Hof Trucking.

The Plaintiff in this case, Troy Randall, is Triston's father and executor. Troy Randall asserts claims of wrongful death and negligence against the Estate of Quentin Ary, Jack Youde and Van-Hof Trucking. The Defendants deny Plaintiffs' claims and also dispute the nature and extent of the harms and damages claimed by Plaintiffs.

Authority
Iowa Civil Jury Instructions, 100.1.

INSTRUCTION NO. 1

My duty is to tell you what the law is. Your duty is to accept and apply this law.

You must consider all of the instructions together because no one instruction includes all of the applicable law.

The order in which I give these instructions is not important.

Your duty is to decide all fact questions.

As you consider the evidence, do not be influenced by any personal sympathy, bias, prejudices or emotions. Because you are making very important decisions in this case, you are to evaluate the evidence carefully and avoid decisions based on generalizations, gut feelings, prejudices, sympathies, stereotypes, or biases. The law demands that you return a just verdict, based solely on the evidence, your reason and common sense, and these instructions. As jurors, your sole duty is to find the truth and do justice.

Authority

Iowa Civil Jury Instructions, 100.2.

INSTRUCTION NO. 2

Whenever a party must prove something they must do so by the preponderance of the evidence.

Preponderance of the evidence is evidence that is more convincing than opposing evidence. Preponderance of the evidence does not depend upon the number of witnesses testifying on one side or the other.

Authority

Iowa Civil Jury Instructions, 100.3.

INSTRUCTION NO. 3

You shall base your verdict only upon the evidence and these instructions.

Evidence is:

1. Testimony in person or by deposition.
2. Exhibits received by the court.
3. Stipulations which are agreements between the attorneys.
4. Any other matter admitted (e.g. answers to interrogatories, matters which judicial notice was taken, and etc.).

Evidence may be direct or circumstantial. The weight to be given any evidence is for you to decide.

Sometimes, during a trial, references are made to pre-trial statements and reports, witnesses' depositions, or other miscellaneous items. Only those things formally offered and received by the court are available to you during your deliberations. Documents or items read from or referred to which were not offered and received into evidence, are not available to you.

The following are not evidence:

1. Statements, arguments, questions and comments by the lawyers.
2. Objections and rulings on objections.
3. Any testimony I told you to disregard.
4. Anything you saw or heard about this case outside the courtroom.

Authority

Iowa Civil Jury Instructions, 100.4.

INSTRUCTION NO. 4

You will decide the facts from the evidence. Consider the evidence using your observations, common sense and experience. You must try to reconcile any conflicts in the evidence; but, if you cannot, you will accept the evidence you find more believable.

In determining the facts, you may have to decide what testimony you believe. You may believe all, part or none of any witnesses' testimony.

There are many factors which you may consider in deciding what testimony to believe, for example:

1. Whether the testimony is reasonable and consistent with other evidence you believe;
2. The witnesses' appearance, conduct, age, intelligence, memory and knowledge of the facts; and,
3. The witnesses' interest in the trial, their motive, candor, bias and prejudice.

Authority

Iowa Civil Jury Instructions, 100.9.

INSTRUCTION NO. 5

You may not communicate about this case before reaching your verdict. This includes cell phones, and electronic media such as text messages, Facebook, YouTube, Twitter, email, etc.

Do not do any research or make any investigation about this case on your own. Do not visit or view any place discussed in this case, and do not use Internet maps or Google Earth or any other program or device to search for or to view any place discussed in the testimony. Also, do not research any information about this case, the law, or the people involved, including the parties, the witnesses, the lawyers, or the judge. This includes using the Internet to research events or people referenced in the trial.

This case will be tried on evidence presented in the courtroom. If you conduct independent research, you will be relying on matters not presented in court. The parties have a right to have this case decided on the evidence they know about and that has been introduced here in court. If you do some research or investigation or experiment that we do not know about, then your verdict may be influenced by inaccurate, incomplete or misleading information that has not been tested by the trial process, including the oath to tell the truth and by cross-examination. All of the parties are entitled to a fair trial, rendered by an impartial jury, and you must conduct yourself so as to maintain the integrity of the trial process. If you decide a case based on information not presented in court, you will have denied the parties a fair trial in accordance with the rules of this state and you will have done an injustice. It is very important that you abide by these rules.

It is important that we have your full and undivided attention during this trial.

Authority

Iowa Civil Jury Instructions, 100.23.

INSTRUCTION NO. 6

In these instructions I will be using the term "fault." Fault means one or more acts or omissions towards the person of the actor or of another which constitutes negligence.

Authority:

Iowa Civil Jury Instructions, 400.1.

INSTRUCTION NO. 7

"Negligence" means failure to use ordinary care. Ordinary care is the care which a reasonably careful person would use under similar circumstances. "Negligence" is doing something a reasonably careful person would not do under similar circumstances, or failing to do something a reasonably careful person would do under similar circumstances.

Authority:

Iowa Civil Jury Instructions, 700.2.

INSTRUCTION NO. 8

The plaintiffs claim that Quentin Ary was negligent in one or more of the following particular(s):

1. Failure to maintain control of his vehicle.
2. Failure to reduce driving speed to a reasonable and proper rate when approaching and traveling through a crossing or intersection of highways.
3. Failure to stop or yield at the entrance to a through highway and yield the right-of-way.
4. Failure to stop at a stop intersection indicated by a stop sign.
5. Failure to keep a “proper lookout.”

These grounds of fault are explained to you in other instructions.

The plaintiffs must prove all of the following propositions:

1. Ary was negligent or at fault.
2. Ary’s negligence or fault was a cause of the plaintiffs’ damage.
3. The amount of damage.

If the plaintiffs have failed to prove any of these propositions, the plaintiffs are not entitled to damages from the Ary Estate. If the plaintiffs have proved all of these propositions, the plaintiffs are entitled to damages, and you will need to determine Ary’s percentage of fault.

Authority:

Iowa Civil Jury Instructions, 400.5.

INSTRUCTION NO. 9

The plaintiffs claim that Jack Youde was negligent while driving on behalf of Van-Hof in one or more of the following particular(s):

1. Failure to drive at a safe and careful speed due to road conditions.
2. Exceeding the advised speed limit.
3. Failure to maintain control of his vehicle.
4. Failure to reduce driving speed to a reasonable and proper rate when approaching and traveling through a crossing or intersection of highways.
5. Driving a vehicle across the centerline of the highway and on the wrong side of the road.
6. Failure to keep a “proper lookout.”
7. Failure to give warning with a horn when reasonably necessary to insure safe operation of the vehicle.

These grounds of fault are explained to you in other instructions.

The plaintiffs must prove all of the following propositions:

1. Youde was negligent or at fault.
2. Youde’s negligence or fault was a cause of the plaintiffs’ damage.
3. The amount of damage.

If the plaintiffs have failed to prove any of these propositions, the plaintiffs are not entitled to damages from Youde and Van-Hof. If the plaintiffs have proved all of these

propositions, plaintiffs are entitled to damages, and you will need to determine Youde's and Van Hof's percentage of fault.

Authority:

Iowa Civil Jury Instructions, 400.5.

INSTRUCTION NO. 10

A corporation is liable for negligent acts of an agent if the acts are done in the scope of the agency. In this case, it is undisputed that Van-Hof is liable as a principal if Youde committed negligent acts.

AUTHORITY:

Iowa Civil Jury Inst. No. 730.1 (modified)

INSTRUCTION NO. 11

Any person driving a vehicle on a highway shall drive at a careful speed not greater than nor less than is reasonable and proper, having due regard for the traffic, surface and width of the highway and of any other existing conditions.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.1.

INSTRUCTION NO. 12

At the time and place of the collision, the advisory speed limit for Youde's vehicle was 50 miles per hour under normal conditions.

If you find Youde exceeded this speed, you may consider it to be negligence.

Authority:

Iowa Civil Jury Instructions, 600.2.

INSTRUCTION NO. 13

A driver must have his or her vehicle under control. It is under control when the driver can guide and direct its movement, control its speed and stop it reasonably fast.

A violation of this duty is negligence.

Authority

Iowa Civil Jury Instructions, 600.7.

INSTRUCTION NO. 14

A driver operating a vehicle must have it under control and shall reduce its speed to a reasonable and proper rate when approaching and traveling through a crossing or intersection of highways.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.8.

INSTRUCTION NO. 15

Road conditions may be such that speed should be less than the legal limit. Traffic laws call for the minimum of care and not the maximum. A driver should not operate a vehicle up to the legal speed limit if the circumstances are such that ordinary care requires a lesser speed.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.9.

INSTRUCTION NO. 16

A vehicle shall be driven on the right half of the road on all roads of sufficient width, except as follows:

1. When overtaking and passing another vehicle going in the same direction under the rules governing such movement.

2. When an obstruction makes it necessary to drive to the left of the center of the road. Any person doing so shall yield the right-of-way to all vehicles traveling in the opposite direction upon the open portion of the road within a distance which is an immediate danger.

3. On a road divided into three marked lanes for traffic under the rules which apply.

4. On a road restricted to one-way traffic.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.11.

INSTRUCTION NO. 17

Both drivers have a right to use the road, but each must respect the rights of the other. Each driver may assume the other would obey the law until they knew, or in the exercise of ordinary care, should have known the other driver was not going to obey the law.

Authority:

Iowa Civil Jury Instructions, 600.71.

INSTRUCTION NO. 18

The driver of a vehicle shall stop or yield at the entrance to a through highway and shall yield the right-of-way to other vehicles which have entered the intersection from the through highway or which are approaching so closely on the through highway that they are a danger. Then the driver, having yielded, may proceed to cautiously and carefully enter the through highway.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.38.

INSTRUCTION NO. 19

The driver of a vehicle approaching a stop intersection indicated by a stop sign or a flashing red light shall stop at the first opportunity at either the clearly marked stop line, or before entering the crosswalk, or before entering the intersection, or at a point nearest the intersecting road where the driver has a view of approaching traffic on the intersecting road before entering the intersection. Before going ahead, the driver shall yield the right-of-way to any vehicle in the intersecting road which has entered the intersection or which is approaching so closely that it is an immediate danger during the time the driver is moving through the intersection.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.39.

INSTRUCTION NO. 20

"Proper lookout" is the lookout a reasonable person would keep in the same or similar situation. It means more than looking and seeing. It includes being aware of the operation of the driver's vehicle in relation to what the driver saw or should have seen.

A violation of this duty is negligence.

Authority:

Iowa Civil Jury Instructions, 700.12.

INSTRUCTION NO. 21

Every motor vehicle operated upon a highway shall be equipped with a horn in good working order capable of being heard under normal conditions from at least 200 feet. When reasonably necessary to insure safe operation, the driver of the vehicle shall give such warning. The horn shall not otherwise be used and shall not give out an unreasonably loud or harsh sound or whistle.

A violation of this law is negligence.

Authority:

Iowa Civil Jury Instructions, 600.96.

INSTRUCTION NO. 22

You have heard testimony from persons described as experts. Persons who have become experts in a field because of their education and experience may give their opinion on matters in that field and the reasons for their opinion.

Consider expert testimony just like any other testimony. You may accept it or reject it. You may give it as much weight as you think it deserves, considering the witness' education and experience, the reasons given for the opinion, and all the other evidence in the case.

Authority

Iowa Civil Jury Instructions, 100.12.

INSTRUCTION NO. 23

As executor of the Estate of Triston Randall, Troy Randall has the authority to bring a claim, as well as collect damages arising from a claim, on behalf of Triston's Estate.

Authority:
Iowa Code § 633.81.

INSTRUCTION NO. 24

A cause of action against a deceased person such as Quentin Ary survives that person's death and may be brought against his Estate or legal representatives.

AUTHORITY:

Iowa Code § 611.20; § 611.22

INSTRUCTION NO. 25

If you find Troy Randall as personal representative of the Estate of Triston Randall is entitled to recover damages, it is your duty to determine the amount. In doing so you shall consider the following items:

1. Physical and mental pain and suffering from the time of injury to the time of death. Physical pain and suffering may include, but is not limited to, bodily suffering or discomfort. Mental pain and suffering may include, but is not limited to, mental anguish or loss of enjoyment of life.
2. Loss of function of the mind and body from the time of injury to the time of death.
3. The present value of additional amounts Triston Randall would reasonably be expected to have accumulated as a result of his own effort from the date he would have reached age eighteen until he had lived out the terms of his life. This calculation is explained in Instruction No. 24.

The amount you assess for physical and mental pain and suffering and loss of function of mind and body cannot be measured by any exact or mathematical standard. You must use your sound judgment based upon an impartial consideration of the evidence. Your judgment must not be exercised arbitrarily, or out of sympathy or prejudice, for or against the parties. The amount you assess for any item of damage must not exceed the amount caused by the defendant(s) as proved by the evidence.

INSTRUCTION NO. 26

In determining the present value of additional amounts Triston Randall would reasonably be expected to have accumulated as a result of his own effort from the date he would have reached age eighteen until he had lived out the terms of his life, you may consider:

1. His life expectancy.
2. His health, physical and mental condition.
3. His habits as to industry, thrift and economy.
4. His interest in school.
5. His grades and attendance in school.
6. The occupation of his parents.
7. The uncertainties of life such as ill health, unemployment, increased or decreased earning capacity as age advances.
8. The amount of taxes, both federal and state, which would be payable out of earnings.
9. All other facts and circumstances bearing on the amount he might have accumulated.

Authority

Iowa Civil Jury Instructions, 200.27.

INSTRUCTION NO. 27

If you find Troy Randall individually is entitled to recover damages as the result of the death of Triston Randall, it is your duty to determine the amount. In doing so you shall consider the following items:

1. The reasonable value of the past loss of services, which include loss of companionship and society of the child, from the date of the death to the present time, minus the probable cost of the child's board and maintenance during that time period.

2. The present value of the future loss of services, which include loss of companionship and society of the parent and child, including during Triston's adulthood, minus the present value of the probable cost of child support and maintenance during that same time period.

Items 1 and 2 include the loss of Triston's earnings while a minor, the economic or monetary value of Triston's child's labor if you find he unemployed or underemployed, as well as the parent's right to the intangible benefits of companionship, cooperation and affection of the child. They do not include the parent's mental anguish caused by the child's death.

In determining loss of companionship and society, you may consider the circumstances of the life of Triston including:

1. His age, health, strength, intelligence, character, interests and personality.
2. Activities in the household and community.
3. All other facts and circumstances bearing on the issue.

The amount you assess for loss of services in the past and future cannot be measured by any exact or mathematical standard. You must use your sound judgment based upon an impartial consideration of the evidence. Your judgment must not be exercised arbitrarily, or out of

sympathy or prejudice, for or against the parties. The amount you assess for any item of damages must not exceed the amount caused by the defendant(s) as proved by the evidence.

A party cannot recover duplicate damages. Do not allow amounts awarded under one item of damage to be included in any amount awarded under another item of damage. Similarly, damages awarded from one party shall not be included in any amount awarded from to another party.

The amounts, if any, you find for each of the above items will be used to answer the special verdicts.

Authority

Iowa Civil Jury Instructions, 200.28A (as modified for the facts herein).
Iowa Code § 613.15A.

INSTRUCTION NO. 28

Future damages must be reduced to present value. "Present value" is a sum of money paid now in advance which, together with interest earned at a reasonable rate of return, will compensate the plaintiff for future losses.

Authority:

Iowa Civil Jury Instructions, 200.35B.

INSTRUCTION NO. 29

The normal life expectancy of people who are the same age as Triston Randall is 77-80 years. You may use this information, together with all the other evidence about Triston Randall's prior health, habits, occupation, and lifestyle, when deciding issues of future damages.

Authority:

Iowa Civil Jury Instructions, 200.36 (modified based on expert witness reports)

INSTRUCTION NO. 30

In arriving at an item of damage or any percentage of fault you cannot arrive at a figure by taking down the estimate of each juror as to an item of damage or a percentage of fault, and agreeing in advance that the average of those estimates shall be your item of damage or percentage of fault.

Authority

Iowa Civil Jury Instructions, 200.38.

INSTRUCTION NO. 31

The conduct of a party is a cause of damage when the damage would not have happened except for the conduct. There can be more than one cause of an injury or damage.

Authority:

Iowa Civil Jury Instructions, 700.3.

INSTRUCTION NO. 32

Damages may be the fault of more than one person. In comparing fault, you should consider all of the surrounding circumstances as shown by the evidence, together with the conduct of Quentin Ary and Jack Youde and the extent of the causal relation between their conduct and the damages claimed. You should then determine what percentage, if any, each person's fault contributed to the damages. Defendants Jack Youde and Van-Hof Trucking, Inc., are to be treated as a single party for the purpose of determining their percentage of fault.

Authority:

Iowa Civil Jury Instructions, 400.2.
Iowa Code § 321.493.

INSTRUCTION NO. 33

There can be more than one cause of an injury or damage. When the fault of two or more separate parties is so related to an event that their combined fault, when viewed as a whole, is the cause of the event without which the event would not occur, then the fault of each party may be a cause.

Authority:

Iowa Civil Jury Instructions, 700.4.

INSTRUCTION NO. 34

Upon retiring you shall select a foreman or forewoman. It will be his or her duty to see discussion is carried on in an orderly fashion, the issues are fully and freely discussed, and each juror is given an opportunity to express his or her views.

Your attitude at the beginning of your deliberations is important. It is not a good idea for you to take a position before thoroughly discussing the case with the other jurors. If you do this, individual pride may become involved and you may later hesitate to change an announced position even if shown it may be incorrect. Remember you are not partisans or advocates, but are judges - judges of the facts. Your sole interest is to find the truth and do justice.

Authority:

Iowa Civil Jury Instructions, 100.18.

INSTRUCTION NO. 35

During the trial, you have been allowed to take notes. You may take these with you to the jury room to use in your deliberations. Remember, these are notes and not evidence.

Generally, they reflect the recollection or impressions of the evidence as viewed by the person taking them, and may be inaccurate or incomplete.

Upon reaching a verdict, leave the notes in the jury room and they will be destroyed.

Authority

Iowa Civil Jury Instructions, 100.21.

IN THE IOWA DISTRICT COURT IN AND FOR BENTON COUNTY

TROY RANDALL, INDIVIDUALLY AND)	
AS EXECUTOR OF THE ESTATE OF)	
TRISTON RANDALL,)	No. 009375
)	
Plaintiffs,)	VERDICT FORM NO. 1 (ESTATE OF
)	TRISTON RANDALL)
v.)	
)	
DENNIS ARY AND SANDRA ARY, CO-)	
ADMINISTRATORS OF THE ESTATE OF)	
QUENTIN RAY ARY; THE ESTATE OF)	
QUENTIN RAY ARY; JACK YOUDE; AND)	
VAN-HOF TRUCKING, INC.,)	
)	
Defendants.)	

We, the jury, find the following verdict on the questions submitted to us:

Question No. 1: On the claim of Troy Randall as the Executor of the Estate of Triston Randall against the Estate of Quentin Ray Ary, we find in favor of:

Troy Randall: _____

The Estate of Quentin Ary: _____

If you find in favor of the Estate of Quentin Ary, do not answer Question No. 2.

Question No. 2: The percentage of total fault assigned to Quentin Ary is:

ANSWER: _____ Note: The percentages in your Answer to No. 2 and No. 4 must add up to 100 percent.

Question No. 3: On the claim of Troy Randall as the Executor of the Estate of Triston Randall against Jack Youde and Van-Hof Trucking, we find in favor of:

Troy Randall: _____

Jack Youde/Van-Hof _____

If you found in favor of Jack Youde/Van Hof, do not answer question No. 4

Question No. 4: The percentage of total fault assigned to Jack Youde/Van-Hof is:

Answer: _____ Note: the percentages in your answers to No. 2 and No. 4 must add up to 100 percent.

Question No. 5:

We award the following damages to Troy Randall as Executor of the Estate of Triston Randall. Do not reduce the damages based on any percentages assigned above. The Court will make any necessary calculations.

1. Lost accumulations to Triston Randall's estate: \$ _____

2. Triston Randall's past pain and suffering: \$ _____

TOTAL: \$ _____

*FOREPERSON

*To be signed only if Verdict is unanimous.

**JUROR

**JUROR

**JUROR

**JUROR

**JUROR

**JUROR

**JUROR

**To be signed by Jurors agreeing hereto after six hours or more of deliberation.

IN THE IOWA DISTRICT COURT IN AND FOR BENTON COUNTY

TROY RANDALL, INDIVIDUALLY AND)	
AS EXECUTOR OF THE ESTATE OF)	
TRISTON RANDALL,)	No. 009375
)	
Plaintiffs,)	VERDICT FORM NO. 2 (TROY
)	RANDALL INDIVIDUALLY)
v.)	
)	
DENNIS ARY AND SANDRA ARY, CO-)	
ADMINISTRATORS OF THE ESTATE OF)	
QUENTIN RAY ARY; THE ESTATE OF)	
QUENTIN RAY ARY; JACK YOUDE; AND)	
VAN-HOF TRUCKING, INC.,)	
)	
Defendants.)	

We, the jury, find the following verdict on the questions submitted to us:

Question No. 1: On the claim of Troy Randall individually against the Estate of Quentin Ray

Ary, we find in favor of:

Troy Randall: _____

The Estate of Quentin Ary: _____

If you find in favor of the Estate of Quentin Ary, do not answer Question No. 2.

Question No. 2: The percentage of total fault assigned to Quentin Ary is:

ANSWER: _____ Note: The percentages in your Answer to No. 2 and No. 4 must
add up to 100 percent.

Question No. 3: On the claim of Troy Randall individually against Jack Youde and Van-Hof Trucking, we find in favor of:

Troy Randall: _____

Jack Youde/Van-Hof _____

If you found in favor of Jack Youde/Van Hof, do not answer question No. 4

Question No. 4: The percentage of total fault assigned to Jack Youde/Van-Hof is:

Answer: _____ Note: the percentages in your answers to No. 2 and No. 4 must add up to 100 percent.

Question No. 5:

We award the following damages to Troy Randall individually. Do not reduce the damages based on any percentages assigned above. The Court will make any necessary calculations.

1. Past loss of services, companionship and society: \$ _____

2. Future loss of services, companionship and society: \$ _____

TOTAL: \$ _____

*FOREPERSON

*To be signed only if Verdict is unanimous.

**JUROR

**JUROR

**JUROR

**JUROR

**JUROR

**JUROR

**JUROR

**To be signed by Jurors agreeing hereto after six hours or more of deliberation.