

**IN THE IOWA DISTRICT COURT IN AND FOR ALLAMAKEE COUNTY**

<b>BRAD WINTERS,</b> <b>Plaintiff,</b> <b>vs.</b> <b>ALLAMAKEE COUNTY, IOWA,</b> <b>Defendant.</b>	<b>Case No. LACV026807</b>  <b>VERDICT</b>
--	--

**Question No. 1: Was the Defendant at fault?**ANSWER:   X   Yes        No

[If your answer is "no," do not answer any further questions]

**Question No. 2: Was the fault of Defendant a cause of damage to the Plaintiff?**ANSWER:   X   Yes        No

[If your answer is "no," do not answer any further questions]

**Question No. 3: Was the Plaintiff at fault?**ANSWER:   X   Yes        No

[If your answer is "no," do not answer Questions 4 or 5]

**Question No. 4: Was the Plaintiff's fault a cause of any item of damage to him?**ANSWER:   X   Yes        No

[If you answer "no," do not answer Question No. 5. Instead, go to Question No. 6.]

**Question No. 5: Using 100% as the total combined fault of the Plaintiff and the Defendant, what percentage of such combined fault do you assign to the Plaintiff and what percentage of such combined fault do you assign to the Defendant?**

ANSWER:           Plaintiff     80   %  
                      Defendant   20   %

TOTAL:                               100%

[Go to the next question.]

**Question No. 6: State the amount of damages sustained by the Plaintiff caused by Defendant's negligence or fault as to the following items of damage. Do not take into consideration any reduction of damages due to Plaintiff's fault, if any. If the Plaintiff has failed to prove any damage, or has failed to prove that damage was caused by Defendant's fault, enter 0.**

Past Medical Expenses	\$ _____
Future Medical Expenses	\$ _____
Past Lost Wages	\$ _____
Future Loss of Earning Capacity	\$ _____
Past Loss of Function of Body	\$ _____
Future Loss of Function of Body	\$ _____
Past Pain and Suffering	\$ _____
Future Pain and Suffering	\$ _____

TOTAL (add the separate items of damage) \$ \_\_\_\_\_

(If you answered question no. 6 go on to answer the following special interrogatory)

**SPECIAL INTERROGATORY:**

If you find that Plaintiff has failed to mitigate his damages by acting unreasonably in failing to attend physical therapy, insert the percentage to reduce Plaintiff's past pain and suffering and past loss of function from 2/6/19 to the present: \_\_\_\_%

If you find that Plaintiff failed to mitigate his damages by acting unreasonably with respect to his shoulder by failing to attend physical therapy, delaying surgery, and not wearing a sling, insert the percentage to reduce Plaintiff's past pain and suffering and past loss of function from May of 2021 through the present: \_\_\_\_%

If you find that Plaintiff failed to mitigate his damages by acting unreasonably in failing to seek employment to reduce his wage claim, insert the percentage to reduce his past lost wage claim from March 26, 2019 to the present: \_\_\_\_%



\_\_\_\_\_  
FOREMAN OR FOREWOMAN\*

\* To be signed only if verdict is unanimous.

---

Juror \*\*

---

Juror\*\*

---

Juror \*\*

---

Juror\*\*

---

Juror \*\*

---

Juror\*\*

---

Juror \*\*

\*\* To be signed by the jurors agreeing to it after six hours or more of deliberation.