

IN THE IOWA DISTRICT COURT IN AND FOR DELAWARE COUNTY

DEBORAH FERGUSON,

Plaintiff,

vs.

EXIDE TECHNOLOGIES, INC.,
FRED GILBERT, and BRENDA
SAUNDERS,

Defendants.

Case No. LACV008271


**DEFENDANTS' SUPPLEMENTAL
PROPOSED JURY INSTRUCTION**

Defendants submit the following proposed Supplemental Proposed Jury Instruction.

INSTRUCTION NO. ____:

You have heard evidence that the Plaintiff, Deborah Ferguson, has filed a claim against Defendant Exide Technologies, Inc., with the Iowa Workers' Compensation Commissioner seeking workers' compensation benefits as a result of an injury to her arms. The Workers' Compensation agency will consider what workers' compensation benefits the Plaintiff is entitled to as a result of her arm injury. You are not to consider the Plaintiff's entitlement to workers' compensation benefits your determination of Plaintiff's damages in this case.

SIMMONS PERRINE MOYER BERGMAN, PLC

By: 
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ATTORNEY FOR DEFENDANTS

| CERTIFICATE OF SERVICE | |
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| The undersigned certifies that on <u>3-7</u> , 2018, this document was electronically filed with the Clerk of Court using EDMS which will send notification of such filing to the following: | |
| Amy Beck Fiedler & Timmer, P.L.L.C. 8831 Windsor Parkway Johnston, IA 50131 ATTORNEYS FOR PLAINTIFF amy@employmentlawiowa.com | |
| SIGNED /s/ Thomas D. Wolle | |