

IN THE IOWA DISTRICT COURT FOR CARROLL COUNTY

REGION XII COUNCIL OF	)	
GOVERNMENTS,	)	NO. LACV039605
	)	
Plaintiffs,	)	
vs.	)	
	)	
GLENDA PUDENZ	)	COUNTERCLAIM PLAINTIFF
	)	GLENDA PUDENZ'S
	)	REQUESTED JURY INSTRUCTIONS
	)	
Defendant.	)	

PROGRESSIVE UNIVERASAL	)	
INSURANCE COMPANY, as subrogee of	)	
GLENDA PUDENZ, and GLENDA	)	
PUDENZ, Individually,	)	
	)	
Counterclaim Plaintiffs,	)	
vs.	)	
	)	
REGION XII COUNCIL OF	)	
GOVERNMENTS,	)	
	)	
Counterclaim Defendant.	)	

Counterclaim Plaintiff Glenda Pudenz requests the Court to give the following jury instructions:

Iowa Civil Jury Instructions about law of the road and duties of drivers as follows:

- 600.1 Reasonable and Proper
- 600.3 Assured Clear Distance
- 600.7 Control of vehicle
- 600.9 Less than statutory speed limit
- 600.11 Driving on right half with certain exceptions
- 600.14 Overtaking another vehicle
- 600.60 Stopping on Traveled Way
- 600.72 Lookout

Iowa Civil Jury Instructions regarding Glenda Pudenz's claims of damages:

- 200.1. Damages – elements
- 200.2 Property damage – cost of repair of vehicles
- 200.6 Past medical bills
- 200.8 Past loss of earnings
- 200.10 Past loss of function body and mind
- 200.12 Past physical and mental pain & suffering
- 200.32 Aggravation of pre-existing condition
- 200.34 Previous infirm condition

Respectfully submitted,



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