

34TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. BERNARD

STATE OF LOUISIANA

NO. 94-840

DIVISION "D"

**AUGUST GUILLOT and JULI GUILLOT, Individually and
as the Survivors of their Minor Child, Collin Jacob Guillot,
and Natural Tutor of their Minor Child, Madison Guillot**

-versus-

CHRYSLER

FILED: _____

DEPUTY CLERK

JURY INTERROGATORIES

1. QUESTION NO. 1

Do you find that the Plaintiffs' vehicle was unreasonably dangerous in design?

YES NO

If you answered YES, answer Question 2. If you answered NO, skip Question 2 and answer Question 3.

2. QUESTION NO. 2

Do you find that the unreasonably dangerous design of the Plaintiffs' vehicle proximately caused the Plaintiffs to sustain damage?

YES NO

Please answer Question 3.

3. QUESTION NO. 3

Do you find that the Plaintiffs' vehicle was unreasonably dangerous for lack of adequate warnings?

YES NO

If you answered YES to Question 3, please answer Question 4. If you answered NO to Question 3 and also answered NO to Question 1 or Question 2, STOP and do not answer any further questions, sign and date this form and return to the courtroom.

4. **QUESTION NO. 4**

Do you find that the lack of adequate warnings proximately caused the Plaintiffs to sustain damages?

YES ✓ NO _____

If you answered YES to either Question 4 or Question 2, please answer Question 5. If you answered otherwise, STOP and do not answer any further questions, sign and date this form and return to the courtroom.

5. **QUESTION NO. 5**

Do you find that August Guillot was negligent and that his negligence proximately caused or contributed to the Plaintiffs' damages?

YES ✓ NO _____

Please proceed to Question 6.

6. **QUESTION NO. 6**

Please state the percentage of fault, if any, attributable to Chrysler and August Guillot. (Note that if you answered NO to Question 5, you should not assign any percentage of fault to August Guillot. Also note that the total of your percentages must be 100%)

Chrysler 99 %

August Guillot 1 %

TOTAL 100%

Please proceed to Question 7.

7. **QUESTION NO. 7**

Without considering or deducting any sums for the percentage(s) found in Question 6, please state what amount of money, if any, would reasonably and fairly compensate each plaintiff for the following categories of damages:

AUGUST AND JULI GUILLOT:

Collin's medical expenses	\$ <u>65,000</u>
Collin's funeral and burial expenses	\$ <u>5,000</u>
Survival action for Collin's pain and suffering during his life	\$ <u>10,000</u>

JULI GUILLOT:

Past and future physical pain and suffering as a result of her physical injuries:	\$ <u>250,000</u>
Past and future mental pain and anguish as a result of her injuries:	\$ <u>500,000</u>
Permanent impairment and disfigurement:	\$ <u>150,000</u>
Loss of ability to bear additional children:	\$ <u>350,000</u>
Loss of enjoyment of life as a consequence of her injuries:	\$ <u>200,000</u>
Medical and medical related expenses for treatment of her injuries:	\$ <u>25,000</u>
Mental anguish and emotional distress as a consequence of witnessing the injury to Collin:	\$ <u>250,000</u>
Loss of Collin's love, affection and companionship and mental pain, suffering and distress resulting from Collin's death:	\$ <u>1,000,000</u>
Loss of consortium, services and society due to the accident:	\$ <u>50,000</u>

AUGUST GUILLOT:

Past and future mental anguish and emotional distress:

A) For witnessing injuries to Juli and Collin: \$ 400,000

B) As a result of the consequences of the accident: \$ 450,000

Loss of enjoyment of life as a consequence of his injuries: \$ 200,000

Loss of Collin's love, affection and companionship and mental pain, suffering and distress resulting from Collin's death: \$ 1,000,000

Loss of consortium, services and society due to the accident: \$ 50,000

MADISON GUILLOT:

Mental anguish and emotional distress as a result of witnessing injuries to her mother and brother: \$ 50,000

Loss of consortium, services and society due to the accident: \$ 75,000

Please sign and date this form.



FOREPERSON
Francis A. Dardis, Jr.

Apr. 10, 2008
DATE