

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

DENNIS MURPHY, in his capacity as Personal Representative of the Wrongful Death Estate of Ruben Bonilla, Jr. and, ANNIE-LAURIE COOGAN, in her capacity as Personal Representative of the Wrongful Death Estate of Serina T. Clark, as assignees for claims brought by Plaintiffs, CLARKE C. COLL, Chapter 7 Trustee of the Bankruptcy Estate of Pawan Kumar Jain,

Plaintiffs,

v.

No. D-202-CV-2016-04582
Judge Elaine Lujan

PROFESSIONAL UNDERWRITERS LIABILITY
INSURANCE COMPANY, a foreign insurance
Company,

Defendant.

SPECIAL VERDICT

On the questions submitted, the jury finds as follows:

Question No. 1: Did defendant PULIC violate the Unfair Practices Act?

Answer: yes (yes or no)

If the answer to Question No. 1 was "Yes" then you are to continue to Question No. 2. If the answer to Question No. 1 was "No," you are to continue to Question No. 3.

Question No. 2: Did defendant PULIC act willfully in its violation of the Unfair Practices Act?

Answer: yes (yes or no)

Question No. 3: Was defendant PULIC's conduct in reckless disregard for the interests of the insured, based on a dishonest judgment, or otherwise malicious, willful, or wanton?

Answer: yes (yes or no)

If the answer to Question No. 3 was "Yes" then you are to continue to answer Question No. 4. If the answer to Question No. 3 was "No," your verdict is for defendant PULIC and against the plaintiffs on punitive damages. You are to sign this special verdict and return to open court.

Question No. 4: In accordance with the punitive damages instruction given by the court, we find the total amount of punitive damages to be allowed against defendant PULIC to be as follows:

\$ 52,000,000

When as many as ten of you have agreed upon each of your answers (it does not have to be the same ten for each answer), your foreperson must sign this special verdict and return to open court.


Foreperson