

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BARBARA EARNEST

CIVIL ACTION

VERSUS

NO: 16-17144

SANOFI AVENTIS U.S. LLC and
SANOFI US SERVICES, INC.

SECTION "H" (5)

VERDICT FORM

1. Do you find by a preponderance of the evidence that Barbara Earnest has permanent chemotherapy-induced alopecia caused by Taxotere?

___ YES

NO

If the answer to Question 1 is "No," please sign the Verdict Form and return to the courtroom. If the answer to Question 1 is "Yes," please proceed to Question 2.

2. Do you find by a preponderance of the evidence that Sanofi inadequately warned Dr. Carinder of the risk of permanent chemotherapy-induced alopecia associated with Taxotere?

___ YES

___ NO

If the answer to Question 2 is "No," please sign the Verdict Form and return to the courtroom. If the answer to Question 2 is "Yes," please proceed to Question 3.

3. Do you find by a preponderance of the evidence that the Defendants' failure to warn Dr. Carinder was the proximate cause of Barbara Earnest's injuries?

YES

NO

If the answer to Question 3 is "No," please sign the Verdict Form and return to the courtroom. If the answer to Question 3 is "Yes," please proceed to Question 4.

4. Do you find by a preponderance of the evidence that Barbara Earnest lacked actual or constructive knowledge of facts indicating that she was a victim of a tort prior to December 12, 2015?

YES

NO

Please proceed to Question 5.

5. What amount do you find by a preponderance of the evidence is appropriate to fairly and adequately compensate Barbara Earnest for her injuries?

Permanent disfigurement \$ _____

Mental anguish and loss of enjoyment of life, past, present and future \$ _____

New Orleans, Louisiana, this 26th day of September, 2019.



JURY REPRESENTATIVE