

**IN THE STATE COURT OF CLAYTON COUNTY
STATE OF GEORGIA**

STACIE WILLIS, Individually and as the Natural)
Guardian, Parent and Next Friend of the Infant)
DEJUAN WILLIAMS,)

Plaintiff,)

v.)

MELISSA G. JONES, CNM; ANNE SIGOUIN;)
BRIAN REGISTER, MD;)
LIFE CYCLE PEDIATRICS, LLC;)
LIFE CYCLE OB/GYN, LLC;)
ABIGAIL KAMISHLIAN, MD FAAP;)
DAFFODIL PEDIATRIC AND FAMILY)
MEDICAL SERVICES, LLC,)

Defendants.)

CIVIL ACTION

FILE NO. 2014CV02070

PHASE ONE – SPECIAL VERDICT FORM

PART I. PROFESSIONAL STANDARD OF CARE

A. Standard of Care

(1) As to the allegations of professional negligence, liability has been established
as to:

- (a) Melissa Jones, C.N.M. as agent, servant, and employee of Life Cycle
OB/GYN, LLC;
- (b) Brian Register, M.D., as agent, servant and employee of Life Cycle
OB/GYN, LLC;
- (c) Life Cycle OB/GYN, LLC, by and through Melissa Jones, C.N.M. and
Brian Register, M.D.

Abigail Kamishlian's violation of the professional standard of care proximately caused damages for which the Plaintiff seeks recovery?

Yes

No

PART II. COMPENSATORY DAMAGES

(1) On the claim of Stacie Willis for past and future medical and other related costs and expenses for medical treatment related to DeJuan Williams's injuries from the date of the initial injury through his 18th birthday, We, the Jury, award the amount of:

\$ 380,000

(2) On the claim of DeJuan Williams for future medical and other related costs and expenses from the date of his 18th birthday throughout the remainder of his lifetime, We, the Jury, award the amount of:

\$ 400,000

(3) On the claim of DeJuan Williams for his past, present, and future pain and suffering, both mental and physical, and for his disfigurement, from the date of his injury throughout the remainder of his lifetime, We, The Jury, award the amount of:

\$ 30,000,000

PART III. APPORTIONMENT OF COMPENSATORY DAMAGES

For each defendant found liable for damages during Phase One, please enter the percentage (%) of fault you attribute to each defendant. If you found that any defendant did not violate the standard of care or did not proximately cause damages, then you should enter "0" beside that defendant's name. Your percentages must add up to be 100%.

50% Melissa Jones, C.N.M., as agent, servant, and employee of Life Cycle OB/GYN, LLC

30% Brian Register, M.D., as agent, servant, and employee of Life Cycle OB/GYN, LLC

10% Anne Sigouin, C.N.M.

10% Abigail Kamishlian, M.D., as agent, servant, and employee of Daffodil Pediatric and Family Medical Services, LLC

PART IV. SPECIAL INTERROGATORY NO. 1:

(1) Do you find by a preponderance of the evidence that, at the time she violated the professional standard of care, Anne Sigouin, C.N.M., was acting on behalf of Life Cycle Pediatrics, LLC, in addition to Life Cycle OB/GYN, LLC?

Yes _____

No ✓

(2) Do you find by a preponderance of the evidence that Life Cycle Pediatrics, LLC acted as the alter ego of Life Cycle OB/GYN, LLC?

Yes _____

No ✓

PART V. SPECIAL INTERROGATORY NO. 2

(1) Do you find by clear and convincing evidence that Melissa Jones, C.N.M. as agent, servant, and employee of Life Cycle OB/GYN, LLC, engaged in actions or failures to act showing that entire want of care raising the presumption of conscious indifference to consequences?

Yes

No

(2) Do you find by clear and convincing evidence that Brian Register, M.D. as agent, servant, and employee of Life Cycle OB/GYN, LLC, engaged in actions or failures to act showing that entire want of care raising the presumption of conscious indifference to consequences?

Yes

No

(3) Do you find by clear and convincing evidence that Anne Sigouin, C.N.M., engaged in actions or failures to act showing that entire want of care raising the presumption of conscious indifference to consequences?

Yes

No

PART VI: EXPENSES OF LITIGATION AND ATTORNEY'S FEES

A. You, the jury, are to determine whether any of the Defendants listed below are liable for the Plaintiff's expenses of litigation and attorney's fees.

We, the Jury, find that the misconduct of the following defendant(s), giving rise to Plaintiff's claims, was perpetrated in bad faith, that the defendant(s) has/have been stubbornly litigious, or that the defendant(s) has/have caused the Plaintiff unnecessary trouble and expense, entitling Plaintiff to recover expenses of litigation and attorney's fees (check as applicable):

yes Life Cycle OB/GYN, LLC, by and through Melissa Jones, C.N.M.

yes Life Cycle OB/GYN, LLC, by and through Brian Register, M.D.

yes Anne Sigouin, C.N.M.

OR

_____ We, the Jury, find that Plaintiff is not entitled to recover her expenses of litigation and attorney's fees from any Defendant listed.

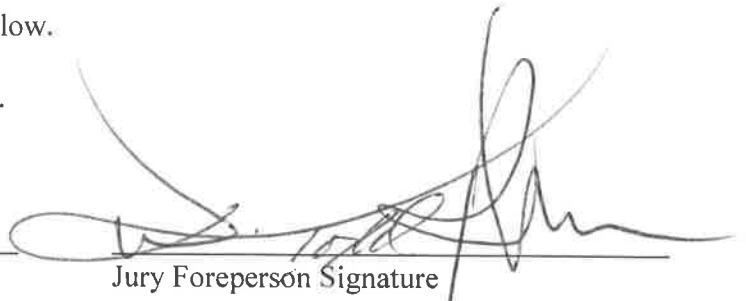
End of Phase I

Please have the foreperson sign and date below.

This 21st day of September, 2018.



Jury Foreperson Printed Name



Jury Foreperson Signature