

ORIGINAL

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

MAX LAGUERRE,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO.: 17A64087
CAJUN CONTRACTORS, INC.,)	
)	
Defendants.)	

VERDICT FORM

PART I:

 ✓ We, the jury, find in favor of Plaintiff Max Laguerre

OR

 We, the jury, find in favor of Defendant.

If you have found in favor of Defendant, **STOP HERE**. You do not need to answer any further questions. Have the jury foreperson sign the verdict and return it.

If you have found in favor of Plaintiff, **CONTINUE to Part II through Part V below**.

PART II:

Vicarious Liability. Do you find that the employees of RYR Construction, LLC were employees of Cajun Contractors, Inc., such that Cajun Contractors, Inc., is liable for any negligence of RYR Construction, LLC?

(Yes)

or

No

PART III:

If you have answered “Yes” to Part II as to vicarious liability, any negligence attributed to RYR Construction, LLC is imputed to Defendant Cajun Contractors, Inc. Therefore, apportion negligence only as between Defendant Cajun Contractors, Inc. and AWH Partners, LLC, d/b/a

Crowne Plaza Hotel Atlanta-Midtown. If you answered "No," then you may apportion percentages of fault as to each of the three parties listed below.

Apportionment. We, the jury, find that Plaintiff's injuries were proximately caused by the negligence of the parties and/or non-parties below. We, the Jury, hereby apportion the negligence that caused Plaintiff's injuries, as follows:

Defendant Cajun Contractors, Inc.	<u>100</u> %
AWH Partners, LLC, d/b/a Crowne Plaza Hotel Atlanta-Midtown	_____ %
RYR Construction, LLC	_____ %
Total (Your allocation of fault must add up to 100%.):	<u>100</u> %

PART IV:

Damages. Having found for the Plaintiff, we award damages without any reduction as to fault in the amount of: \$ 5,000,000.

PART V:

1. **Litigation Expenses.** If you found Defendant Cajun Contractors, Inc. liable, do you find by a preponderance of the evidence that Defendant Cajun Contractors, Inc. acted in bad faith, was stubbornly litigious, or caused the Plaintiff unnecessary trouble or expense, making an award of attorney fees appropriate?

Yes

or

No

2. **Punitive Damages.** If you found Defendant Cajun Contractors, Inc. liable, do you find by clear and convincing evidence that this Defendant's conduct showed that entire want of care which raises the presumption of conscious indifference to consequences such that punitive damages should be imposed to punish or deter it from repeating such wrongful conduct?

Yes

or

No

Please have the foreperson sign and date below.

Dated 20 day of June, 2019.


Jury Foreperson Signature

meredith white
Jury Foreperson Name

ORIGINAL

IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

MAX LAGUERRE,)
)
 Plaintiff,)
 vs.)
 CAJUN CONTRACTORS, INC.,)
)
 Defendant.)

CIVIL ACTION FILE
NO.: 17A64087-6

VERDICT

1. We, the jury, award punitive damages in the amount of

\$ 500,330

6.28.19

Date



Foreperson Signature

Meredith White

Foreperson Name