

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILED
SAN MATEO COUNTY

JUL 25 2016

Clerk of the Superior Court
By 
DEPUTY CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN MATEO

JAN CHANDLER, individually and as
Successor-in-Interest to the ESTATE OF
CHRISTOPHER CHANDLER, Deceased, and
COURTNEY CHANDLER, individually and
as Successor-in-Interest to the ESTATE OF
CHRISTOPHER CHANDLER, Deceased, and
BRITTANY CHANDLER, individually and as
Successor-in-Interest to the ESTATE OF
CHRISTOPHER CHANDLER, Deceased, and
TYLER CHANDLER, individually and as
Successor-in-Interest to the ESTATE OF
CHRISTOPHER CHANDLER, Deceased,

Plaintiffs,

vs.

STATE OF CALIFORNIA, and DOES ONE
through FIFTY, inclusive,

Defendants.

Case No. CIV 0501071

SPECIAL VERDICT FORM

Date: November 30, 2015
Time: 9:00 a.m.
Dept.: Dept. 7; Courtroom 8B
Honorable Steven L. Dylina

Complaint Filed: December 1, 2010

We, the jury, answer the questions submitted to us as follows:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. Did Defendant State of California own or control El Camino Real where it intersects Isabella Avenue in Atherton?

Yes No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Was the property in a dangerous condition at the time of the incident?

Yes No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did the dangerous condition create a reasonably foreseeable risk of the kind of injury that occurred?

Yes No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did the State of California's employee(s) create the dangerous condition, or did the State of California have notice of the dangerous condition for a long enough time to have protected against it?

Yes No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

5. Was the dangerous condition a substantial factor in causing the accident?

Yes No

If your answer to question 5 is yes, then answer the remaining questions. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. What are Jan Chandler's damages? Do not reduce the damages based on the fault, if any, of Christopher Chandler or others.

a. The loss of Christopher Chandler's love, companionship, comfort, care, assistance, protection, affection, society, moral support, and sexual relations from September 30, 2010 to the present: \$ 1,500,000

b. The loss of Christopher Chandler's love, companionship, comfort, care, assistance, protection, affection, society, moral support, and sexual relations from today forward: \$ 2,000,000

Jan Chandler's Total Damages: \$ 3,500,000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. What are Courtney Chandler's damages? Do not reduce the damages based on the fault, if any, of Christopher Chandler or others.

a. The loss of Christopher Chandler's love, companionship, comfort, care, assistance, protection, affection, society, and moral support from September 30, 2010 to the present: \$ 1,000,000

b. The loss of Christopher Chandler's love, companionship, comfort, care, assistance, protection, affection, society, and moral support from today forward: \$ 1,000,000

Courtney Chandler's Total Damages: \$ 2,000,000

8. What are Brittany Chandler's damages? Do not reduce the damages based on the fault, if any, of Christopher Chandler or others.

a. The loss of Christopher Chandler's love, companionship, comfort, care, assistance, protection, affection, society, and moral support from September 30, 2010 to the present: \$ 1,000,000

b. The loss of Christopher Chandler's love, companionship, comfort, care, assistance, protection, affection, society, and moral support from today forward: \$ 1,000,000

Brittany Chandler's Total Damages: \$ 2,000,000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

9. What are Tyler Chandler's damages? Do not reduce the damages based on the fault, if any, of Christopher Chandler or others.

a. The loss of Christopher Chandler's love, \$1,000,000
companionhip, comfort, care, assistance, protection,
affection, society, and moral support from September
30, 2010 to the present:

b. The loss of Christopher Chandler's love, \$1,000,000
companionhip, comfort, care, assistance, protection,
affection, society, and moral support from today
forward:

Tyler Chandler's Total Damages: \$2,000,000

TOTAL \$9,500,000

If plaintiffs have proved any damages, then answer question 10. If plaintiffs have not proved any damages, then stop here, answer no further questions, and have the presiding juror sign and date this form.

10. Was Christopher Chandler negligent?

_____ Yes No

If your answer to question 10 is yes, then answer question 11. If you answered no, answer question 12.

11. Was Christopher Chandler's negligence a substantial factor in causing his harm?

_____ Yes _____ No

