

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

CAROL WAYNE FRAZIER AND §
TONYA R. FRAZIER, INDIVIDUALLY §
AND AS REPRESENTATIVE OF THE §
ESTATE OF LAUREN M. FRAZIER, §
DECEASED, §
Plaintiffs §

V. §

HONEYWELL INTERNATIONAL, INC., §
F/K/A ALLIED-SIGNAL, INC. §
Defendant. §

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

FEB 15 2007

DAVID J. MALAND, CLERK

BY DEPUTY RF 3:11 pm

CASE NO. 2-05CV548

(JURY DEMAND)

VERDICT FORM

QUESTION NO. 1:

At the time of the accident, do you find that Lauren Frazier was wearing her available seat belt assembly? Answer "Yes" or "No."

Answer: yes

If you have answered "No" to Question 1, then do not answer any more questions. Go to the end of this verdict form and have the foreperson sign and date the form and return it to the security officer. Otherwise, proceed to Question No. 2.

QUESTION NO. 2:

Do you find that Honeywell International, Inc. designed the seat belt assembly in question? Answer "Yes" or "No."

Answer: yes

QUESTION NO. 3:

Was there a design defect in the seat belt at the time it left the possession of Defendant Honeywell International, Inc., that was a producing cause of the Plaintiffs' injuries and damages? Answer "Yes" or "No."

Answer: yes

QUESTION NO. 4:

Was there a design defect in the automobile at the time it left possession of General Motors that was a producing cause of the injury in question? Answer "Yes" or "No."

Answer: yes

QUESTION NO. 5:

Do you find that the negligence, if any, of those named below proximately caused the injury in question? Answer "Yes" or "No" for each of the following:

- | | | |
|----|-----------------|-----------|
| a. | Natalie White | <u>No</u> |
| b. | Brady Paul Ross | <u>No</u> |

QUESTION NO. 6:

If you have answered "Yes" to Question Nos. 3, 4, and 5 for more than one of those named, then answer the following question. Otherwise, do not answer the following question.

In answering the following questions, the percentages you find must total 100 percent. The percentages must be expressed in whole numbers. The percentage of responsibility attributable to a product or a person is not necessarily measured by the number of acts, omissions or product defects found.

For each product or person found by you to have caused the injury, find the percentage attributable to:

- | | | | |
|----|-------------------------------|------------|---|
| a. | Honeywell International, Inc. | <u>95</u> | % |
| b. | General Motors Corporation | <u>5</u> | % |
| c. | Natalie White | <u>0</u> | % |
| d. | Brady Paul Ross | <u>0</u> | % |
| | Total | <u>100</u> | % |

QUESTION NO.7:

What sum of money, if any, if paid now in cash, would fairly and reasonably compensate Carol Wayne Frazier and Tonya R. Frazier for the death of Lauren Frazier?

Consider the elements of damages listed below and none other. Consider each element separately. Do not include damages for one element in any other element. Do not include interest on any amount of damages you may find.

Answer in dollars and cents for damages, if any, for –

- a. Mental anguish sustained in the past Carol Wayne Frazier.

Answer: \$ 2,000,000⁰⁰

- b. Mental anguish sustained in the past Tonya R. Frazier.

Answer: \$ 2,000,000⁰⁰

- c. Mental anguish that, in reasonable probability, Carol Wayne Frazier will sustain in the future.

Answer: \$ 4,000,000⁰⁰

- d. Mental anguish that, in reasonable probability, Tonya R. Frazier will sustain in the future.

Answer: \$ 4,000,000⁰⁰

- e. Loss of companionship and society in the past by Carol Wayne Frazier.

Answer: \$ 2,000,000⁰⁰

- f. Loss of companionship and society in the past by Tonya R. Frazier.

Answer: \$ 2,000,000⁰⁰

- g. Loss of companionship and society that, in reasonable probability, Carol Wayne Frazier will sustain in the future.

Answer: \$ 4,000,000⁰⁰

- h. Loss of companionship and society that, in reasonable probability, Tonya R. Frazier will sustain in the future.

Answer: \$ 4,000,000⁰⁰

URY FOREPERSON

2-16-07
DATE