

VERDICT FORM

1. Do you find that Ms. Scroggin has proven by clear and convincing evidence that Wyeth knew, or should have known, in light of the surrounding circumstances, that its failure to warn would naturally and probably result in breast cancer and that Wyeth continued such conduct (i) with malice or (ii) in reckless disregard of the consequences from which malice may be inferred and, therefore, that Wyeth should be required to pay her punitive damages?

X YES _____ NO

2. If you answered "yes" to Question Number 1, state the amount of punitive damages, if any, Wyeth should be required to pay Ms. Scroggin:

\$ 19 million three hundred sixty thousand
19,360,000⁰⁰

3. Do you find that Ms. Scroggin has proven by clear and convincing evidence that Upjohn knew, or should have known, in light of the surrounding circumstances, that its failure to warn would naturally and probably result in breast cancer and that Upjohn continued such conduct (i) with malice or (ii) in reckless disregard of the consequences from which malice may be inferred and, therefore, that Upjohn should be required to pay her punitive damages?

X YES _____ NO

4. If you answered "yes" to Question Number 3, state the amount of punitive damages, if any, Upjohn should be required to pay Ms. Scroggin:

\$ 7 million seven hundred sixty thousand
7,760,000

Robney J. Summers
PRESIDING JUROR