

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

BRADLEY D. BIRTALAN, in individual,

Plaintiff,

vs.

FRANK L. DEWITT, an individual,

Defendant.

CIVIL DIVISION

NO.: G.D. 10-018207

SPECIAL JURY INTERROGATORIES

(JURY TRIAL DEMANDED)

Filed on Behalf of Defendant,
Frank L. Dewitt

Counsel of Record for this Party:

Gregg A. Guthrie, Esquire
PA I.D. #59203

SUMMERS, McDONNELL, HUDOCK,
GUTHRIE & SKEEL, P.C.
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BRADLEY D. BIRTALAN, in individual,

CIVIL DIVISION

Plaintiff,

NO.: G.D. 10-018207

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Defendant.

DEFENDANT'S PROPOSED SPECIAL JURY INTERROGATORIES

Defendant, Frank L. DeWitt, by his attorneys, Summers, McDonnell, Hudock, Guthrie & Skeel, Pc and Gregg A. Guthrie, Esquire, files the following Proposed Special Jury Interrogatories:

1. Was the negligence of Defendant, Frank L. DeWitt, a factual cause in bringing about harm to the Plaintiff, **Bradley D. Birtalan**?

_____ Yes _____ No

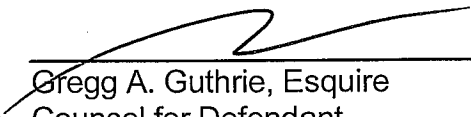
If you answered Question No. 1 "No," the Plaintiff, **Bradley D. Birtalan**, cannot recover and you should not answer any further questions and should return to the courtroom.

2. State the amount of money damages, if any, sustained by the Plaintiff, **Bradley D. Birtalan**, that were directly caused by the accident of October 11, 2008.

\$ _____.

Respectfully submitted,

**SUMMERS, McDONNELL, HUDOCK,
GUTHRIE & SKEEL, P.C.**



Gregg A. Guthrie, Esquire
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **SPECIAL JURY INTERROGATORIES** have been served via first-class U.S. mail, postage prepaid, this

18 day of May, 2012, addressed as follows:

Christina K. Hurnyak, Esquire
RUDBERG LAW OFFICES, LLC
2107 Sidney Street
Pittsburgh, PA 15203

**SUMMERS, McDONNELL, HUDOCK,
GUTHRIE & SKEEL, P.C.**



Gregg A. Guthrie, Esquire
Counsel for Defendant