

DUPLICATE

ORIGINAL



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARCUS VAUGHN, et al.,
Plaintiffs,

v.

CITY OF LOS ANGELES, et al.,
Defendants.

Case No. CV 16-03086-AB (AJWx)
SPECIAL VERDICT FORM

1 WE, THE JURY in the above-entitled action, unanimously find as follows on
2 the questions submitted to us:
3

4 **QUESTION 1:**

5 Did Officer Ramirez use excessive force against Redel Jones in violation of her
6 Fourth Amendment constitutional rights?

7 YES _____ NO X _____
8

9 *If you answered "Yes," please proceed to Question 2.*

10 *If you answered "No," please skip Questions 2 and 3, and proceed to Question 4.*
11

12 **QUESTION 2:**

13 Was the use of excessive force by Officer Ramirez a cause of injury, pain,
14 suffering, or death to Redel Jones?

15 YES _____ NO _____
16

17 *Please proceed to the next question.*
18

19 **QUESTION 3:**

20 Did Officer Ramirez use excessive force to detain Redel Jones with a purpose
21 to harm her unrelated to legitimate law enforcement objectives?

22 YES _____ NO _____
23

24 *Proceed to Question 4.*
25
26
27
28

1 **QUESTION 4:**

2 As to Plaintiffs' battery claim, did Officer Ramirez use unreasonable force
3 against Redel Jones?

4 YES _____ NO X _____

5
6 *If you answered "Yes," please proceed to Question 5.*

7 *If you answered "No," please proceed to Question 6.*
8

9 **QUESTION 5:**

10 Was Officer Ramirez's use of unreasonable force a substantial factor in causing
11 the death of Redel Jones?

12 YES _____ NO _____
13

14 *Please proceed to Question 6.*
15

16 **QUESTION 6:**

17 Did Officer Ramirez negligently use unreasonable force against Redel Jones?
18

19 YES _____ NO X _____
20

21 *If you answered "Yes," please proceed to Question 7.*

22 *If you answered "No," please sign and date this verdict form and return it to the*
23 *Court.*
24
25
26
27
28

1 **QUESTION 7:**

2 Was the negligence of Officer Ramirez a substantial factor in causing Redel
3 Jones's death?

4 YES _____ NO _____

5
6 *If you answered "Yes," please proceed to Question 8.*

7 *If you answered "No," please sign and date this verdict form and return it to the*
8 *Court.*

9
10 **QUESTION 8:**

11 Was Redel Jones negligent?

12 YES _____ NO _____

13
14 *If you answered "Yes," please proceed to Question 9.*

15 *If you answered "No," please sign and date this verdict form and return it to the*
16 *Court.*

17
18 **QUESTION 9:**

19 Was Redel Jones's negligence a substantial factor in causing her death?

20 YES _____ NO _____

21
22 *If you answered "Yes," please proceed to Question 10.*

23 *If you answered "No," please sign and date this verdict form and return it to the*
24 *Court.*

QUESTION 10:

What percentage of negligence do you assign to Officer Ramirez and which percentage of negligence do you assign to Redel Jones, which you believe caused Ms. Jones's death? (Your total must equal 100%.)

Officer Ramirez: _____ %

Redel Jones: _____ %

TOTAL: 100%

Please sign and date this verdict form and return it to the court.

Dated: 10.9.19

Signed

/s/ redacted signature

Foreperson