<<COURT\_NAME>>

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| <<PROVIDER\_SUITNAME>>,  a/a/o <<INJUREDPARTY\_NAME>>    Plaintiff,  vs.  <<INSURANCECOMPANY\_SUITNAME>>  Defendant. | Case No. <<INDEXORAAA\_NUMBER>> |

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PLAINTIFF’S NOTICE OF FILING

PROPOSED JURY INSTRUCTIONS

AND PROPOSED VERDICT FORM

<<PROVIDER\_SUITNAME>>, by and through the undersigned counsel, hereby files with the Court, the attached Proposed Jury Instructions and Proposed Verdict Form, for use in the proceedings in this action.

**CERTIFICATE OF SERVICE**

­­­­­­­­­­­­­I HEREBY CERTIFY that on February 19, 2022, a true and correct copy of the foregoing was filed and served on the Defendant through the Florida E-File Portal.

Florida Insurance Law Group, LLC

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262

Logo, company name

Description automatically generated

Leo Manon III, Esq.

Fla. Bar No. 115757

[Pleadings@flinslaw.com](mailto:Pleadings@flinslaw.com)

<<COURT\_NAME>>

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| --- | --- |
| <<PROVIDER\_SUITNAME>>,  a/a/o  <<INJUREDPARTY\_NAME>>    Plaintiff,    vs.    <<INSURANCECOMPANY\_SUITNAME>>    Defendant. | Case No. <<INDEXORAAA\_NUMBER>> |

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PLAINTIFF'S REQUESTED STANDARD

AND SPECIAL JURY INSTRUCTIONS

Plaintiff, <<PROVIDER\_SUITNAME>>, requests this Court grant the following requested jury instructions to be read to the jury at the conclusion of the trial of this cause subject to the withdrawal by Plaintiff's counsel of one or more of the requested instructions prior to the time that the same are read to the jury by this Honorable Court.

There are a total of 17 jury instructions in this set derived from both the Florida Standard Jury Instructions and any special instructions with authority submitted herewith and copies are distributed as follows:

A. One set to adverse counsel;

B. One set for permanent filing in the Court file (original);

C. One set for use by the Court at charge conference and for reading to the jury;

D. One set for the undersigned.

Plaintiff, <<PROVIDER\_SUITNAME>>, requests that the Honorable Court, upon the conclusion of the reading of the jury instructions and the submission of this case to the jury, file separately, in the Court file, the actual instructions read to the jury, together with any modifications thereto or any statutes read, for the purposes of any appeal that may be taken by either side.

Dated this February 19, 2022.

Florida Insurance Law Group, LLC

8724 Sunset Drive, #260, Miami, FL 33173

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Jury Instruction No. 1

(“Oath of Jurors before Voir Dire”)

Do you solemnly swear or affirm that you will answer truthfully all questions asked of you as prospective jurors so help you God?

Jury Instruction No. 2

(“Description of the Case”)

Welcome. The clerk will now administer your oath.

Now that you have been sworn, I would like to give you an idea about what we are here to do. This is a civil trial. A civil trial is different from a criminal case, where a defendant is charged by the state prosecutor with committing a crime. The subject of a civil trial is a disagreement between people or companies or in this case, a private company and an insurance company, where the claims of one or more of these parties have been brought to court to be resolved. It is called "a trial of a lawsuit."

This case is a case about a claim for breach of contract filed by the Plaintiff, <<PROVIDER\_SUITNAME>> a/a/o <<INJUREDPARTY\_NAME>>, against the Defendant, <<INSURANCECOMPANY\_SUITNAME>>. The Plaintiff seeks payment for services rendered to the home of <<INJUREDPARTY\_NAME>> on or about <<DOS\_START>> which is insured by the Defendant. Plaintiff and Defendant have a dispute as to whether or not the Defendant has breached its policy of insurance covering <<INJUREDPARTY\_NAME>>’s property.

The principal witnesses who may testify in this case are:

1. Corporate Representative of <<PROVIDER\_SUITNAME>>.
2. Expert witness of <<PROVIDER\_SUITNAME>>.
3. Insured, <<INJUREDPARTY\_NAME>>.
4. Adjuster and or Corporate Representative of <<INSURANCECOMPANY\_SUITNAME>>.

Jury Instruction No. 3

(“Introduction of Participants and Their Roles”)

Judge/Court: I am the Judge. You may hear people occasionally refer to me as "The Court." That is the formal name for my role. My job is to maintain order and decide how to apply the rules of the law to the trial. I will also explain various rules to you that you will need to know in order to do your job as the jury. It is my job to remain neutral on the issues of this lawsuit.

A party who files a lawsuit is called the Plaintiff. A party that is sued is called the Defendant.

The attorneys to whom I will introduce you have the job of representing their clients. That is, they speak for their clients here at the trial. They have taken oaths as attorneys to do their best and to follow the rules of their profession.

Plaintiff’s Counsel: The attorney on this side of the courtroom, Robert F. Gonzalez, Esq., represents <<PROVIDER\_SUITNAME>>, the party who filed the lawsuit in this case. Their job is to present their client's side of the dispute herein. They and their client will be referred to most of the time as "the Plaintiff."

Defendant's Counsel: The attorneys on the other side of the courtroom, represent <<INSURANCECOMPANY\_SUITNAME>>, the party that has been sued here. Their job is to present their client's side of things to you. They and their client will be referred to here as "the Defendant."

Court Clerk: This person sitting in front of me, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, is the court clerk. [He] [She] is here to assist me with some of the mechanics of the trial process, including the numbering and collection of the exhibits that are introduced in the course of the trial.

Court Reporter: The person sitting at the stenographic machine, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, is the court reporter. [His] [Her] job is to keep an accurate legal record of everything we say and do during this trial.

Bailiff: The person over there, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, is the bailiff. [His] [Her] job is to maintain order and security in the courtroom. The bailiff is also my representative to the jury. Anything you need or any problems that come up for you during the course of the trial should be brought to [him] [her]. However, the bailiff cannot answer any of your questions about the case. Only I can do that.

Jury: Last, but not least, is the jury, which we will begin to select in a few moments from among all of you. The jury's job will be to decide what the facts are and what the facts mean. Jurors should be as neutral as possible at this point and have no fixed opinion about the lawsuit.

In order to have a fair and lawful trial, there are rules that all jurors must follow. A basic rule is that jurors must decide the case only on the evidence presented in the courtroom. You must not communicate with anyone, including friends and family members, about this case, the people and places involved, or your jury service. You must not disclose your thoughts about this case or ask for advice on how to decide this case.

I want to stress that this rule means you must not use electronic devices or computers to communicate about this case, including tweeting, texting, blogging, e-mailing, posting information on a website or chat room, or any other means at all. Do not send or accept any messages to or from anyone about this case or your jury service.

You must not do any research or look up words, names, maps, or anything else that may have anything to do with this case. This includes reading newspapers, watching television or using a computer, cell phone, the Internet, any electronic device, or any other means at all, to get information related to this case or the people and places involved in this case. This applies whether you are in the courthouse, at home, or anywhere else.

Many of you may have cell phones, tablets, laptops or other electronic devices with you here in the courtroom.

All cell phones, computers, tablets or other types of electronic devices must be turned off while you are in the courtroom. Turned off means that the phone or other electronic device is actually off and not in a silent or vibrating mode. You may use these devices during recesses, but even then you may not use your cell phone or electronic device to find out any information about the case or communicate with anyone about the case or the people involved in the case. Do not take photographs, video recordings or audio recordings of the proceedings or of your fellow jurors. After each recess, please double check to make sure your cell phone or electronic device is turned off. At the end of the case, while you are deliberating, you must not communicate with anyone outside the jury room. You cannot have in the jury room any cell phones, computers, or other electronic devices. If someone needs to contact you in an emergency, the court can receive messages and deliver them to you without delay. A contact phone number will be provided to you.

What are the reasons for these rules? These rules are imposed because jurors must decide the case without distraction and only on the evidence presented in the courtroom. If you investigate, research, or make inquiries on your own outside of the courtroom, the trial judge has no way to make sure that the information you obtain is proper for the case. The parties likewise have no opportunity to dispute or challenge the accuracy of what you find. That is contrary to our judicial system, which assures every party the right to ask questions about and challenge the evidence being considered against it and to present argument with respect to that evidence. Any independent investigation by a juror unfairly and improperly prevents the parties from having that opportunity our judicial system promises.

Any juror who violates these restrictions jeopardizes the fairness of these proceedings, and a mistrial could result that would require the entire trial process to start over. A mistrial is a tremendous expense and inconvenience to the parties, the court, and the taxpayers. If you violate these rules, you may be held in contempt of court, and face sanctions, such as serving time in jail, paying a fine or both.

All of your communications with courtroom personnel, or me, will be part of the record of these proceedings. That means those communications shall either be made in open court with the court reporter present or, if they are in writing, the writing will be filed with the court clerk. I have instructed the courtroom personnel that any communications you have with them outside of my presence must be reported to me, and I will tell the parties [and their attorneys] about any communication from you that I believe may be of interest to the parties [and their attorneys].

If you become aware of any violation of these instructions or any other instruction I give in this case, you must tell me by giving a note to the bailiff.

Jury Instruction No. 4

(“Explanation of Voir Dire Process”)

I will now explain to you how the selection process works.

Questions/Challenges: This is the part of the case where the parties and their lawyers have the opportunity to get to know a little bit about you, in order to help them come to their own conclusions about your ability to be fair and impartial, so they can decide who they think should be the jurors in this case.

How we go about that is as follows: First, I will ask some general questions of you. Then, each of the lawyers will have more specific questions that they will ask of you. After they have asked all of their questions, I will meet with them and they will tell me their choices for jurors. Each side can ask that I exclude a person from serving on a jury if they can give me a reason to believe that he or she might be unable to be fair and impartial. That is what is called a challenge for cause. The lawyers also have a certain number of what are called peremptory challenges, by which they may exclude a person from the jury without giving a reason. By this process of elimination, the remaining persons are selected as the jury. It may take more than one conference among the parties, their attorneys, and me before the final selections are made.

Purpose of Questioning: The questions that you will be asked during this process are not intended to embarrass you or unnecessarily pry into your personal affairs, but it is important that the parties and their attorneys know enough about you to make this important decision. If a question is asked that you would prefer not to answer in front of the whole courtroom, just let me know and you can come up here and give your answer just in front of the attorneys and me. If you have a question of either the attorneys or me, do not hesitate to let me know.

Response to Questioning: There are no right or wrong answers to the questions that will be asked of you. The only thing that I ask is that you answer the questions as frankly, as honestly, and as completely as you can. You [will take] [have taken] an oath to answer all questions truthfully and completely and you must do so. Remaining silent when you have information you should disclose is a violation of that oath as well. If a juror violates this oath, it not only may result in having to try the case all over again but also can result in civil and criminal penalties against a juror personally. So again, it is very important that you be as honest and complete with your answers as you possibly can. If you do not understand the question, please raise your hand and ask for an explanation or clarification.

In sum, this is a process to assist the parties and their attorneys to select a fair and impartial jury. All of the questions they ask you are for this purpose. If, for any reason, you do not think you can be a fair and impartial juror, you must tell us.

Jury Instruction No. 5

(“Oath of Juror After Voir Dire”)

Do you solemnly swear or affirm that you will well and truly try this case between the Plaintiff and Defendant and a true verdict render according to the law and evidence so help you God?

Jury Instruction No. 6

(“Introduction”)

You have now taken an oath to serve as jurors in this trial. Before we begin, I am going to tell you about the rules of law that apply to this case and let you know what you can expect as the trial proceeds.

To recover damages from Defendant for breach of contract, Plaintiff must prove the following:

1. Insured and Defendant entered into a contract;
2. Insured executed an assignment of benefits to Plaintiff;
3. Insured did all, or substantially all, of the essential things which the contract required [him] [her] to do or that [he] [she] was excused from doing those things;
4. Defendant failed to do something essential, which the contract required it to do;
5. Plaintiff was damaged by that failure.

It is my intention to give you all of the rules of law but it might be that I will not know for sure all of the law that will apply in this case until all of the evidence is presented. However, I can anticipate most of the law and give it to you at the beginning of the trial so that you will better understand what to be looking for while the evidence is presented. If I later decide that different or additional law applies to the case, I will tell you. In any event, at the end of the evidence I will give you the final instructions on which you must base your verdict. At that time, you will have a complete written set of the instructions so you do not have to memorize what I am about to tell you.

Jury Instruction No. 7

(“Explanation of the Trial Procedure”)

Now that you have heard the law, I want to let you know what you can expect as the trial proceeds.

Opening Statements: In a few moments, the attorneys will each have a chance to make what are called opening statements. In an opening statement, an attorney is allowed to give you [his] [her] views about what the evidence will be in the trial and what you are likely to see and hear in the testimony.

Evidentiary Phase: After the attorneys' opening statements, the Plaintiff will bring their witnesses and evidence to you.

Evidence: Evidence is the information that the law allows you to see or hear in deciding this case. Evidence includes the testimony of the witnesses, documents, and anything else that I instruct you to consider.

Witnesses: A witness is a person who takes an oath to tell the truth and then answers attorneys' questions for the jury. The answering of attorneys' questions by witnesses is called "giving testimony." Testimony means statements that are made when someone has sworn an oath to tell the truth.

The Plaintiffs lawyer will normally ask a witness the questions first. That is called direct examination. Then the defense lawyer may ask the same witness additional questions about the witness’ testimony. That is called cross-examination. Certain documents or other evidence may also be shown to you during direct or cross-examination. After the plaintiffs witnesses have testified, the defendant will have the opportunity to put witnesses on the stand and go through the same process. Then the plaintiff’s lawyer gets to do cross-examination. The process is designed to be fair to both sides.

It is important that you remember that testimony comes from witnesses. The attorneys do not give testimony and they are not themselves witnesses.

Objections: Sometimes the attorneys will disagree about the rules for trial procedure when a question is asked of a witness. When that happens, one of the lawyers may make what is called an "objection." The rules for a trial can be complicated, and there are many reasons for attorneys to object. You should simply wait for me to decide how to proceed. If I say an objection is "sustained," that means you should disregard the question and the witness may not answer the question. If I say the objection is "overruled," that means the witness may answer the question.

When there is ·an objection and I make a decision, you must not assume from that decision that I have any particular opinion other than that the rules for conducting a trial are being correctly followed. If I say a question may not be asked or answered, you must not try to guess what the answer would have been. That is against the rules, too.

Side Bar Conferences: Sometimes I will need to speak to the attorneys about legal elements of the case that are not appropriate for the jury to hear. The attorneys and I will try to have as few of these conferences as possible while you are giving us your valuable time in the courtroom. But, if we do have to have such a conference during testimony, we will try to hold the conference at the side of my desk so that we do not have to take a break and ask you to leave the courtroom.

Recesses: Breaks in an ongoing trial are usually called "recesses." During a recess, you still have your duties as a juror and must follow the rules, even while having coffee, at lunch, or at home.

Instructions Before Closing Arguments: After all the evidence has been presented to you, I will instruct you in the law that you must follow. It is important that you remember these instructions to assist you in evaluating the final attorney presentations, which come next, and, later, during your deliberations, to help you correctly sort through the evidence to reach your decision.

Closing Arguments: The attorneys will then have the opportunity to make their final presentations to you, which are called closing arguments.

Final Instructions: After you have heard the closing arguments, I will instruct you further in the law as well as explain to you the procedures you must follow to decide the case.

Deliberations: After you hear the final jury instructions, you will go to the jury room and discuss and decide the questions I have put on your verdict form. [You will have a copy of the jury instructions to use during your discussions.] The discussions you have and the decisions you make are usually called "jury deliberations." Your deliberations are absolutely private and neither I nor anyone else will be with you in the jury room.

Verdict: When you have finished answering the questions, you will give the verdict form to the bailiff, and we will all return to the courtroom where your verdict will be read. When that is completed, you will be released from your assignment as a juror.

Finally, before we begin the trial, I want to give you just a brief explanation of rules you must follow as the case proceeds.

Keeping an Open Mind: You must pay close attention to the testimony and other evidence as it comes into the trial. However, you must avoid forming any final opinion or telling anyone else your views on the case until you begin your deliberations. This rule requires you to keep an open mind until you have heard all of the evidence and is designed to prevent you from influencing how your fellow jurors think until they have heard all of the evidence and had an opportunity to form their own opinions. The time and place for corning to your final opinions and speaking about them with your fellow jurors is during deliberations in the jury room, after all of the evidence has been presented, closing arguments have been made, and I have instructed you on the law. It is important that you hear all of the facts and that you hear the law and how to apply it before you start deciding anything.

Consider Only the Evidence: It is the things you hear and see in this courtroom that matter in this trial. The law tells us that a juror can consider only the testimony and other evidence that all the other jurors have heard and seen in the presence of the judge and the lawyers. Doing anything else is wrong and is against the law. That means that you must not do any work or investigation of your own about the case. You must not obtain on your own any information about the case or about anyone involved in the case, from any source whatsoever. This includes reading newspapers, watching television or using a computer, cell phone, the Internet, any electronic device, or any other means at all, to get information related to this case or the people and places involved in this case. This applies whether you are in the courthouse, at home, or anywhere else. You must not visit places mentioned in the trial or use the internet to look at maps or pictures to see any place discussed during trial.

Do not provide any information about this case to anyone, including friends or family members. Do not let anyone, including the closest family members, make comments to you or ask questions about the trial. Jurors must not have discussions of any sort with friends or family members about the case or the people and places involved. So, do not let even the closest family members make comments to you or ask questions about the trial. In this age of electronic communication, I want to stress again that just as you must not talk about this case face-to-face, you must not talk about this case by using an electronic device. You must not use phones, computers or other electronic devices to communicate. Do not send or accept any messages related to this case or your jury service. Do not discuss this case or ask for advice by any means at all, including posting information on an Internet website, chat room or blog.

No Mid-Trial Discussions: When we are in a recess, do not discuss anything about the trial or the case with each other or with anyone else. If attorneys approach you, do not speak with them. The law says they are to avoid contact with you. If an attorney will not look at you or speak to you, do not be offended or form a conclusion about that behavior. The attorney is not supposed to interact with jurors outside of the courtroom and is only following the rules. The attorney is not being impolite. If an attorney or anyone else does try to speak with you or says something about the case in your presence, please inform the bailiff immediately.

Only the Jury Decides: Only you get to deliberate and answer the verdict questions at the end of the trial. I will not intrude into your deliberations at all. I am required to be neutral. You should not assume that I prefer one decision over another. You should not try to guess what my opinion is about any part of the case. It would be wrong for you to conclude that anything I say or do means that I am for one side or another in the trial. Discussing and deciding the facts is your job alone.

All cell phones or other types of electronic devices must be turned off while you are in the courtroom. Turned off means that the phone or other electronic device is actually off and not in a silent or vibrating mode. You may use these devices during recesses, but even then you may not use your phone or electronic device to find out any information about the case or communicate with anyone about the case or the people involved in the case. Do not take photographs, video recordings or audio recordings of the proceedings or your fellow jurors. After each recess, please double check to make sure your device is turned off. At the end of the case, while you are deliberating, you must not communicate with anyone outside the jury room. You cannot have in the jury room any cell phones, computers, or other electronic devices. If there are breaks in the deliberations, I may allow you to communicate with your family or friends, but do not communicate about the case or your deliberations. If someone needs to contact you in an emergency, the court can receive messages and deliver them to you without delay. The court's phone number will be provided to you.

Jury Instruction No. 8

(“Explanation of the Law”)

Members of the jury, I shall now instruct you in the law that you must follow in reaching your verdict. It is your duty as jurors to decide the issues, and only those issues, that I submit for determination by your verdict. In reaching your verdict, you should consider and weigh the evidence, decide the disputed issues of fact, and apply the law on which I shall instruct you, to facts as you find them from the evidence.

The evidence in this case consists of the sworn testimony of the witnesses, all exhibits received in evidence, and all facts that may be admitted or agreed to by the parties, and any fact of which the court has taken judicial notice.

In determining the facts, you may draw reasonable inferences from the evidence. You may make deductions and reach conclusions which reason and common sense lead you to draw from the facts shown by the evidence in this case. But you should not speculate on any matters outside the evidence.

Jury Instruction No.9

(“Believability of the Witness”)

In determining the believability of any witness and the weight to be given the testimony of any witness, you may properly consider the demeanor of the witness while testifying; the frankness or lack of frankness of the witness; the intelligence of the witness; any interest the witness may have in the outcome of the case; the means and opportunity the witness had to know the facts about which the witness testified; the ability of the witness to remember the matters about which the witness testified; and the reasonableness of the testimony of the witness, considered in the light of all the evidence in the case and in the light of your own experience and common sense.

Jury Instruction No. 10

(“Weight of the Testimony”)

Some of the testimony from several witnesses before you was in the form of opinions about certain technical subjects.

You may accept such opinion testimony, reject it, or give it the weight you think it deserves, considering the knowledge, skill experience, training, or education of the witnesses, the reasons given by the witnesses for the opinions expressed, and all the other evidence in this case.

Jury Instruction No. 11

(“Note Taking by Jurors”)

If you would like to take notes during the trial, you may do so. On the other hand, of course, you are not required to take notes if you do not want to. That will be left up to you individually.

You will be provided with note pad and pen for use if you wish to take notes. Any notes that you take will be for your personal use. However, you should not take them with you from the courtroom. During recesses, the bailiff will take possession of your notes and will return them to you when we reconvene. After you have completed your deliberations, the bailiff will deliver your notes to me. They will be destroyed. No one will ever read your notes.

If you take notes, do not get so involved in note taking that you become distracted from the proceedings. Your notes should be used only as aids in your memory.

Whether or not you take notes, you should rely on your memory of the evidence and the notes of the jurors should not unduly influence you. Notes are not entitled to any greater weight than each juror’s memory of the evidence.

Jury Instruction No. 12

(“Juror Questions”)

During the trial, you may have a question about these proceedings. If so, please write it down and hand it to the bailiff, who will then hand it to me. I will review your question with the parties and their attorneys before responding.

Jury Instruction No. 13

(“Issue Introductions”)

The sole issue for your determination in this case is:

1. Whether the damages suffered by the insured property occurred during the term of coverage of the subject policy of insurance.
2. Whether the subject policy of insurance has a specific exclusion justifying the Defendant from not paying the Plaintiff for its services rendered to the insured property.

Jury Instruction No. 14

(“The Greater Weight of the Evidence”)

"Greater weight of the evidence" means the more persuasive and convincing force and effect of the entire evidence in the case.

Jury Instruction No. 15

(“Verdict Instructions”)

If the greater weight of the evidence does not support the claim of Plaintiff, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ on that issue, then your verdict should be for Defendant, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

However, if the greater weight of the evidence does support the claim of Plaintiff, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, on that issue, then your verdict should be for Plaintiff, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and against Defendant, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Jury Instruction No. 16

(“A Fair Verdict”)

Your verdict must be based on the evidence that has been received and the law on which I have instructed you. In reaching your verdict, you are not to be swayed in the performance of your duty by prejudice, sympathy or any other sentiment for or against any party.

Jury Instruction No. 17

(“Foreperson Instruction”)

When you retire to the jury room, you should select one of your members to act as foreperson to preside over your deliberations and sign your verdict. Your verdict must be unanimous, that is, your verdict must be agreed to by each of you.

You will be given one form of verdict, which I shall now read to you:

[READ VERDICT FORM]

When you have agreed on your verdict, the foreperson, acting for the jury, should date and sign the appropriate form of verdict. You may now retire to consider your verdict.

CERTIFICATE OF SERVICE

­­­­­­­­­­­­­I HEREBY CERTIFY that on February 19, 2022, a true and correct copy of the foregoing was filed and served on the Defendant through the Florida E-File Portal.

Florida Insurance Law Group, LLC

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262

Logo, company name

Description automatically generated

Leo Manon III, Esq.

Fla. Bar No. 115757

[Pleadings@flinslaw.com](mailto:Pleadings@flinslaw.com)

<<COURT\_NAME>>

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| --- | --- |
| <<PROVIDER\_SUITNAME>>,  a/a/o  <<INJUREDPARTY\_NAME>>    Plaintiff,    vs.    <<INSURANCECOMPANY\_SUITNAME>>    Defendant. | Case No. <<INDEXORAAA\_NUMBER>> |

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PROPOSED VERDICT

1. Did any damages suffered by the insured property more likely than not occur during the term of coverage of the subject policy of insurance?

YES NO

If your answer is NO, your verdict is for the Defendant and you should go no further but to sign and date the verdict form. If your answer is YES, you should answer question 2.

2. Did the subject policy of insurance contain a specific exclusion justifying the Defendant from not paying the Plaintiff for its services rendered to the insured property?

YES NO

If your answer is NO, your verdict is for the Defendant and you should go no further but to sign and date the verdict form. If your answer is YES, your verdict is for the Plaintiff and you should answer question 3.

3. What is the total amount payable to the Plaintiff?

$\_\_\_\_\_\_\_\_\_\_\_\_

SO SAY WE ALL, this            day of , 202

|  |  |  |
| --- | --- | --- |
|  |  | FOREPERSON |