

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Judge Christine M. Arguello**

Civil Action No. ___-cv-____-CMA-___

_____,

Plaintiff,

v.

_____,

Defendant.

SPECIAL INTERROGATORY VERDICT FORM

We, the jury, present our Answers to Questions submitted by the Court, to which we have unanimously agreed:

Question No. 1: Did Plaintiff _____ prove, by a preponderance of the evidence, the element(s) of its claim for breach of insurance contract as set forth in Instruction No. ___?

_____ Yes _____ No

Question No. 2: Did Plaintiff _____, prove, by a preponderance of the evidence, the element(s) of its claim of bad faith breach of insurance contract as set forth in Instruction No. ___?

_____ Yes _____ No

If you answered "Yes" to either or both questions 1 or 2, proceed to Question No. 3. If you answered "No" to both questions 1 and 2, skip Question Nos. 3, 4, and 5 and sign the verdict form.

Question No. 3: Based on Instruction 21, What is the amount of Plaintiff _____'s actual damages incurred as a result of Defendant _____'s breach of insurance contract and/or bad faith breach of insurance contract?

\$_____

If you answered "Yes" to Question 2, proceed to Question No. 4. If you answered "No" to Question 2, skip Question Nos. 4 and 5 and sign the verdict form.

Question No. 4: Do you find beyond a reasonable doubt that Plaintiff _____ is entitled to recover punitive damages from Defendant _____ under Instruction No. ___?

_____ Yes _____ No

If you answered "Yes" to Question No. 4, proceed to Question No. 5. If you answered "No" to Question No. 4, skip Question No. 5 and sign the verdict form.

Question No. 5: What is the amount of punitive damages for Defendant _____'s bad faith breach of insurance contract? \$_____

Please sign and date this Verdict Form on the lines provided below.

Date

Foreperson