

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Chief Judge Philip A. Brimmer

Civil Action No. 21-cv-01915-PAB-KAS

GEORGINA PEREZ,

Plaintiff,

v.

SUNBEAM PRODUCTS, INC., d/b/a Jarden Solutions, and
NEWELL BRANDS, INC.,

Defendants.

VERDICT FORM

We, the jury, upon our oaths, render our verdict in response to the following interrogatories:

1. Do you find by a preponderance of the evidence that Sunbeam Products, Inc. is a manufacturer of the multicooker?

Yes: No:

2. Do you find by a preponderance of the evidence that Newell Brands, Inc. is a manufacturer of the multicooker?

Yes: No:

3. Do you find by a preponderance of the evidence that Ms. Perez has proved her claim of the sale of a defective product based on a design defect against:

- a. Sunbeam Products, Inc.?

Yes: No:

b. Newell Brands, Inc.?

Yes: No:

4. Do you find by a preponderance of the evidence that Ms. Perez has proved her claim of the sale of a defective product based on a failure to warn against:

a. Sunbeam Products, Inc.?

Yes: No:

b. Newell Brands, Inc.?

Yes: No:

5. Do you find by a preponderance of the evidence that Ms. Perez has proved her claim of negligence against:

a. Sunbeam Products, Inc.?

Yes: No:

b. Newell Brands, Inc.?

Yes: No:

If any of your answers to Questions Nos. 3–5 are “Yes,” then answer Question No. 6, Question No. 7, and Question No. 8. If all of your answers to Questions Nos. 3–5 are “No,” do not answer Question No. 6, Question No. 7, and Question 8.

6. Do you find by a preponderance of the evidence that Ms. Perez has damages caused by the negligence or the sale of a defective product by a defendant that you answered “Yes” to in Question Nos. 3–5.

Yes: No:

If your answer is “Yes,” in what amount?

\$ 3,500,000 – Non-economic losses or injuries. See Instruction No. 22, paragraph 1.

\$ 2,000,000 – Physical impairment or disfigurement. See Instruction No. 22, paragraph 2.

7. If your answer is “Yes” to the previous question, do you find beyond a reasonable doubt that Ms. Perez is entitled to punitive damages against:

a. Sunbeam Products, Inc.?

Yes: No:

b. Newell Brands, Inc.?

Yes: No:

If your answer is “Yes,” in what amount?

a. Sunbeam Products, Inc.?

\$ 15,000,000

b. Newell Brands, Inc.?

\$ 35,000,000

8. Do you find that defendants have proven by a preponderance of the evidence that the negligence or fault of Ms. Perez contributed to Ms. Perez's own damages?

Yes: No:

9. What percentage of fault, if any, do you attribute to fault or negligence of each party?

Georgina Perez: 10% Sunbeam Products, Inc.: 27% Newell Brands, Inc.: 63%

The total of these percentages must equal 100%. If you have answered "No" to Question No. 3, Question No. 4, and Question No. 5 for one of the defendants, then you must enter 0% as to that defendant. If your answer to Question No. 8 is "No," you must enter 0% as to Ms. Perez.

DATED December 13, 2024

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