

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION**

**MARTHA WILLIS, INDIVIDUALLY AND
AS MOTHER AND NEXT FRIEND OF
JALEESA WILLIS, A MINOR,**

PLAINTIFFS,

VS.

CIVIL ACTION NO. 2:07CV62-P-A

**KIA MOTORS CORPORATION and KIA
MOTORS AMERICA, INC.,**

DEFENDANTS.

JURY INSTRUCTION P-26A/D37

VERDICT FORM A

You are instructed to read the entire instruction before answering any part of this instruction.

1. Do you find from the preponderance of the evidence that the driver's seatbelt in the subject 2001 Kia Sportage was defective?

Yes ----- No

2. Do you find from a preponderance of the evidence that the driver's door in the subject 2001 Kia Sportage was defective?

Yes ----- No

If you answered "No" to Questions 1 and 2 above, stop and fill out **Verdict Form B**, and advise the Bailiff that you have reached your verdict. If you answered "Yes" to Question

1, Question 2 or both, proceed to the next question.

3. Do you find from a preponderance of the evidence that the defect or defects identified above rendered the subject Kia Sportage unreasonably dangerous?

Yes ----- No

If you answered "No" to the Question 3 above, stop and fill out **Verdict Form B**, and advise the Bailiff that you have reached your verdict. If you answer "Yes" to the question above, proceed to the next question.

4. Do you find that the defective and unreasonably dangerous condition you found in response to the questions above, if any, was a proximate cause of Jaleesa's paralyzing injury?

Yes ----- No

If you answered "No" to Question 4 above, stop and fill out **Verdict Form B**, and advise the Bailiff that you have reached your verdict. If you answer "Yes" to the question above, proceed to the next question.

5. Assign to each person or entity listed below the percentage of fault you attribute in proximately causing or contributing to the injuries of Jaleesa Willis.

100 % Kia Motors Corporation and Kia Motors America, Inc.

0 % Jaleesa Willis

Your percentages must total 100%.

6. Set forth the total amount of damages incurred for each of the following elements

of damages by the plaintiff as a result of the injuries, if any, of Jaleesa Willis. (Do not reduce these amounts for any percentage of fault since the Court will address this)

a. (1) The amount which the plaintiff would have earned from the date of the accident up to the date of trial, if any; (2) the present net cash value of the plaintiff's work life expectancy from the date of trial forward, if any; and (3) any and all reasonable medical, pharmaceutical, and life care expenses necessarily incurred for health care rendered to the plaintiff in the past and in the future, as a result of the occurrence, if any;

\$ 5,570,000.00

b. The past, present, and future pain, suffering, and mental anguish sustained by the plaintiff, if any, as well as the plaintiff's loss of enjoyment of life, if any:

\$ 10,000,000.00

Susan L Trumm

9-4-2009

FOREPERSON

DATE