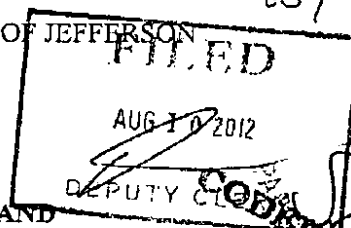


24th JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON
STATE OF LOUISIANA
NO.:628-354 DIVISION "J"

TYRONGLIA WILLIS, INDIVIDUALLY, AND
O/B/O HER MINOR SON, TY'KEVION J. KIDD

VERSUS

OCHSNER CLINIC FOUNDATION, THE LOUISIANA PATIENT'S
COMPENSATION FUND AND/OR THE LOUISIANA PATIENT'S
COMPENSATION FUND OVERSIGHT BOARD, ABBOTT
LABORATORIES A/K/A ABBOTT LABORATORIES INTERNATIONAL
COMPANY, HOSPIRA, NC. A/K/A HOSPIRA WORLDWIDE, INC. AND
RICHARD BRELAND



JURY INTERROGATORIES

1. Do you find by a preponderance of the evidence that Ochsner caused any damages to Ty'Kevion Kidd, in an amount greater than \$100,000?

Yes ✓ No

*If your answer to Question No. 1 was "Yes" go on to Question No. 2.
If your answer to Question No. 1 was "No," date and sign this form and
return to the courtroom.*

2. Do you find by a preponderance of evidence that Abbott/Hospira was responsible for injuries greater than \$100,000.00 sustained by Ty'Kevion Kidd due to an unreasonably dangerous characteristic of the pump manufactured by Abbott/Hospira?

Yes ✓ No

*If your answer to Question No. 2 was "Yes" go on to Question No. 3.
If your answer to Question No. 2 was "No," go on to Question No. 6.*

3. Do you find by a preponderance of the evidence that the infusion pump manufactured by Abbott/Hospira was unreasonably dangerous:

A. Due to its Defective Design?

Yes ✓ No

B. Because an adequate warning about the product had not been provided?

Yes ✓ No _____

C. Because it did not conform to the express warranty of the manufacturer?

Yes ✓ No _____

D. Because of a dangerous construction or composition?

Yes ✓ No _____

Please go to the next question.

4. Do you find by a preponderance of evidence that Richard Breland was responsible for injuries greater than \$100,000.00 sustained by Ty'Kevion Kidd due to an unreasonably dangerous characteristic of the pump manufactured by Abbott/Hospira?

Yes _____ No ✓

Please go to the next question.

5. What portion of the damages in question is attributable to the following parties:

Abbott/Hospira 65 %

Richard Breland 0 %

Louisiana Patient's Compensation Fund 35 %

TOTAL 100 %

(The percentages must total 100%)

Please go to the next question.

6. Is Ty'Kevion Kidd a patient in need of future medical care, including future custodial care, and related care?

Yes ✓ No _____

Please go to the next question.

7. What amount do you find will compensate plaintiff, Ty'Kevion Kidd, for the following damages for which he sustained?

Medical Expenses (Past and Present)	\$ <u>208,000.00</u>
Future Medical Expenses	\$ <u>20,000,000.00</u>
Loss of Earning Capacity	\$ <u>919,916.00</u>
Pain, Suffering, Mental Anguish, (Past, Present, Future)	\$ <u>1,000,000.00</u>
Loss of enjoyment of life	\$ <u>1,000,000.00</u>
Custodial Care (Past, Present)	\$ <u>600,000.00</u>
TOTAL	\$ <u>23,727,916</u>

Please go to the next question.

8. What amount do you find will compensate plaintiff/mother, Tyronglia Willis for the following damages for which she sustained?

Loss of consortium (Love, Affection and Society)	\$ <u>500,000.00</u>
Total	\$ <u>24,227,916</u>

Please go to the next question.

9. Did Abbott/Hospira fail to meet the warranty provisions of their contract with Ochsner Hospital regarding protection from freeflow?

Yes / No


*If your answer to Question No. 8 was "Yes" go on to Question No. 9.
If your answer to Question No. 8 was "No," date and sign this form
and return to the courtroom.*

10. What amount, if any, would compensate Ochsner and the Louisiana Patient's Compensation Fund for Abbott/Hospira's violation of their product's failure to abide by the specification?

\$ 400.00

Please date and sign this form and return to the Courtroom.

8/10/12
DATE


FOREPERSON (Signature)
Arthur A. Cormier
FOREPERSON (Print Name)