

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

INDIANA GRQ, LLC,

Plaintiff,

v.

AMERICAN GUARANTEE AND  
LIABILITY INSURANCE COMPANY *et al.*,

Defendants.

CAUSE NO. 3:21-cv-227 DRL

VERDICT FORM

LIABILITY

1. Liability for Breach of Contract.

- a. Do you find that Indiana GRQ, LLC has proven by a preponderance of the evidence its breach of contract claim for electrical damages against all seven insurers as a collective market? (circle one)

YES      NO

- b. Do you find that Indiana GRQ, LLC has proven by a preponderance of the evidence its breach of contract claim for environmental damages against American Guarantee and Liability Insurance Company, Starr Surplus Lines Insurance Company, Chubb Custom Insurance Company, General Security Indemnity Company of Arizona, Axis Surplus Insurance Company, and Ironshore Specialty Insurance Company (only excluding Interstate Fire & Casualty Company)? (circle one)

YES      NO

2. Liability for Bad Faith.

- a. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against American Guarantee and Liability Insurance Company? (circle one)

YES      NO

- b. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against Interstate Fire & Casualty Company? (circle one)

YES      NO

- c. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against Starr Surplus Lines Insurance Company? (circle one)

YES

NO

- d. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against Chubb Custom Insurance Company? (circle one)

YES

NO

- e. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against General Security Indemnity Company of Arizona? (circle one)

YES

NO

- f. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against Axis Surplus Insurance Company? (circle one)

YES

NO

- g. Do you find that Indiana GRQ, LLC has proven by clear and convincing evidence its bad faith claim against Ironshore Specialty Insurance Company? (circle one)

YES

NO

THE VERDICT FORM CONTINUES ON PAGE 3

DAMAGES

ONLY if you answered "YES" to a liability question on page 1 or 2, please answer the following questions:

1. What do you find to be the total amount of compensatory damages to be awarded to Indiana GRQ, LLC, if any?

\$ 24,719,043

- a. Of the total amount of compensatory damages, what do you find to be the total amount of electrical damages, if any?

\$ 11,577,827

- b. Of the total amount of compensatory damages, what do you find to be the total amount of environmental damages, if any?

\$ 13,141,216

ONLY if you answered "YES" to Question 2(a) on page 1, please answer the following question:

1. What do you find to be the total amount of punitive damages against American Guarantee and Liability Insurance Company, if any?

\$ 12,500,000

ONLY if you answered "YES" to Question 2(b) on page 1, please answer the following question:

1. What do you find to be the total amount of punitive damages against Interstate Fire & Casualty Company, if any?

\$ 12,500,000

ONLY if you answered "YES" to Question 2(c) on page 2, please answer the following question:

1. What do you find to be the total amount of punitive damages against Starr Surplus Lines Insurance Company, if any?

\$ 12,500,000

ONLY if you answered "YES" to Question 2(d) on page 2, please answer the following question:

1. What do you find to be the total amount of punitive damages against Chubb Custom Insurance Company, if any?

\$ 12,500,000

ONLY if you answered "YES" to Question 2(e) on page 2, please answer the following question:

1. What do you find to be the total amount of punitive damages against General Security Indemnity Company of Arizona, if any?

\$ 12,500,000

ONLY if you answered "YES" to Question 2(f) on page 2, please answer the following question:

1. What do you find to be the total amount of punitive damages against Axis Surplus Insurance Company, if any?

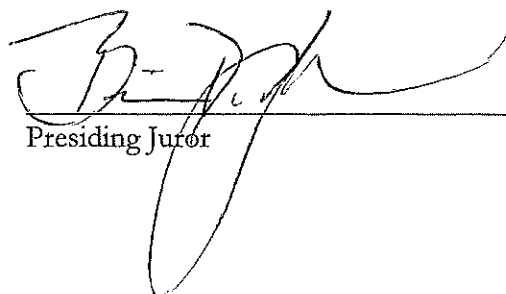
\$ 12,500,000

ONLY if you answered "YES" to Question 2(g) on page 2, please answer the following question:

1. What do you find to be the total amount of punitive damages against Ironshore Specialty Insurance Company, if any?

\$ 12,500,000

May 25th, 2023  
Date

  
\_\_\_\_\_  
Presiding Juror