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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JENNIFER GARNIER, an individual;
ANGELA TOFT, an individual,

Plaintiffs,

vs.

AMERICAN RELIABLE INSURANCE
COMPANY, an Arizona Corporation; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO. CIVDS2021219

SPECIAL VERDICT FORM

JUDGE: Hon. Jeffrey R. Erickson
DEPT.: S14

COMPLAINT FILED: September 30, 2020
TRIAL DATE: March 19, 2024

Jury Master copy

1 We the jury answer the questions submitted to us as follows:

2
3 **I. BREACH OF CONTRACT**

4 1. Did Plaintiffs suffer a loss, all or part of which was covered under an insurance policy
5 with Defendants?

6 Yes No

7 If your answer to question 1 is yes, then answer question 2. If you answered no, stop
8 here, answer no further questions, and have the presiding juror sign and date this form.

9 2. Were Defendants notified of the loss as required by the policy?

10 Yes No

11 If your answer to question 2 is yes, then answer question 3. If you answered no, stop
12 here, answer no further questions, and have the presiding juror sign and date this form.

13 3. Did Defendants fail to pay all or part of a loss covered by the policy?

14 Yes No

15 If your answer to question 3 is yes, then answer question 4. If you answered no, stop
16 here, answer no further questions, and have the presiding juror sign and date this form.

17 4. What is the amount of the covered loss that Defendants failed to pay Plaintiffs?

18 \$ \$1

19 Please proceed to the next section.

20 **II. BREACH OF THE COVENANT OF GOOD FAITH AND FAIR DEALING**

21 1. Did Plaintiffs suffer a loss, all or part of which was covered under an insurance policy
22 with Defendants?

23 Yes No

24 If your answer to question 1 is yes, then answer question 2. If you answered no, stop
25 here, answer no further questions, and have the presiding juror sign and date this form.

26 2. Were Defendants notified of the loss as required by the policy?

27 Yes No

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If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Defendants unreasonably or without proper cause fail to pay or delay in payment of policy benefits?

Yes No

4. Did Defendants unreasonably fail to conduct a full, fair, prompt, and thorough investigation of all the bases of Plaintiffs' claim?

Yes No

If you answered "yes" to either questions 3 or 4, then answer question 5. If you answered "no" to both questions 3 and 4, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Defendants' failure to pay or delay of payment of policy benefits based on a genuine dispute as to the amount owed?

Yes No

If your answer to question 5 is no, then answer question 6. If you answered yes, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Defendants' failure to pay, or conduct a full, fair, prompt, and thorough investigation, or delay in payment of policy benefits a substantial factor in causing harm to Plaintiffs?

Yes No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. Did Defendants act with malice, oppression or fraud?

Yes No

Whether you answered "yes" or "no" to question 7, please proceed to question 8.

8. What are Plaintiffs' damages?

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1) Past non-economic loss, including physical pain, mental suffering, physical impairment, inconvenience, grief, anxiety, loss of enjoyment of life, humiliation, emotional distress.

a) Jennifer Garnier: \$ 3 million
b) Angela Toft \$ 3 million

2) Future non-economic loss.

a) Jennifer Garnier \$ 0
b) Angela Toft \$ 0

TOTAL: \$ 6 million

Dated: April 18, 2024

Signed: Jeri Blum-Johnson
Presiding Juror

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
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JENNIFER GARNIER, an individual;
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AMERICAN RELIABLE INSURANCE
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Defendants.

CASE NO. CIVDS2021219

PUNITIVE DAMAGES VERDICT FORM

JUDGE: Hon. Jeffrey R. Erickson
DEPT.: S14

COMPLAINT FILED: September 30, 2020
TRIAL DATE: March 19, 2024

Formal Copy

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We the jury answer the questions submitted to us as follows:

I. PUNITIVE DAMAGES

1. What amount of punitive damages, if any, do you award against Defendant American Reliable Insurance Company?

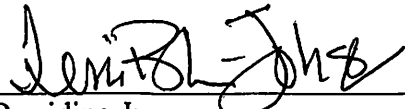
\$ 2 million

2. What amount of punitive damages, if any, do you award against Defendant Global Indemnity Group, LLC?

\$ 10 million

TOTAL: \$ 12 million

Dated: 4/18/2024

Signed: 
Presiding Juror