

DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO

Civil Action No. 98-CV-3248, Courtroom 8

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SPECIAL VERDICT FORM B (Bad Faith)

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TIMOTHY C. ROACH,

Plaintiff,

v.

AMERICAN STANDARD INSURANCE COMPANY OF WISCONSIN,

Defendant.

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DO NOT ANSWER THIS SPECIAL VERDICT FORM B IF YOUR FOREMAN OR  
FOREWOMAN HAS COMPLETED SPECIAL VERDICT FORM A AND ALL JURORS  
HAVE SIGNED IT.

We, the jury, present our Answers to Questions submitted by the Court, to which  
we have all agreed:

1. Did the plaintiff Timothy C. Roach incur injuries, damages or losses?

(Yes or No)

ANSWER: YES

2. Did the defendant act unreasonably in denying plaintiff's claim for

automobile liability insurance coverage? (Yes or No)

ANSWER: YES

3. Did the defendant know such conduct was unreasonable or did the defendant recklessly disregard the fact that its conduct was unreasonable? (Yes or No)

ANSWER: YES

4. Was the defendant's unreasonable conduct a cause of the plaintiff's damages? (Yes or No)

ANSWER: YES

5. State the total amount of the plaintiff's economic and noneconomic damages, if any, caused by the bad faith of defendant American Standard Insurance Company.

ANSWER:

Economic Damages \$ 625,000

Noneconomic Damages \$ 375,000

6. Do you find beyond a reasonable doubt that the defendant's bad faith breach of insurance contract was willful and wanton? (Yes or No)

ANSWER: YES

If your answer is "No," do not proceed further. If your answer to Question No. 6 is "Yes," please answer Question No. 7.

7. State the total amount of punitive damages (not to exceed the amount set forth in the total of your answer to Question No. 5, above).

ANSWER: \$ 1,000,000

J. Jam Cheesman

Jose A. Romero

Adriano L. Manning

James F. Floyd  
Foreman or Forewoman

[Signature]

Robert C. Robinson