

IN THE COURT OF COMMON PLEAS OF ALLEGHENY
COUNTY, PENNSYLVANIA

MICHELLE F. FELTON, Executrix of
the Estate of MICHAELEEN LEE, deceased,

Civil Division

Plaintiffs,

GD No. 23-008055

vs.

JOHNSON & JOHNSON, et al.,

Defendants.

VERDICT SLIP

QUESTION 1

Were any of the following entities negligent?

Avon:	_____	YES	<input checked="" type="checkbox"/>	NO
Colgate Palmolive Company:	_____	YES	<input checked="" type="checkbox"/>	NO
Estee Lauder Inc.:	_____	YES	<input checked="" type="checkbox"/>	NO
Imi Fabi:	_____	YES	<input checked="" type="checkbox"/>	NO
Johnson & Johnson:	<input checked="" type="checkbox"/>	YES	_____	NO
Scholl's Wellness Co., LLC:	_____	YES	<input checked="" type="checkbox"/>	NO

If you have answered "YES" to any of the above please proceed to Question 2.

If you have answered "NO" to all of the above please proceed to Question 4.

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QUESTION 2

Was the negligence of any entity below a factual cause of any harm to Michaelleen Lee?
Only answer for entities for which you have chosen "YES" in Question 1.

Avon:	_____	YES	<u> ✓ </u>	NO
Colgate Palmolive Company:	_____	YES	<u> ✓ </u>	NO
Estee Lauder Inc.:	_____	YES	<u> ✓ </u>	NO
Imi Fabi:	_____	YES	<u> ✓ </u>	NO
Johnson & Johnson:	_____	YES	<u> ✓ </u>	NO
Scholl's Wellness Co., LLC:	_____	YES	<u> ✓ </u>	NO

Please proceed to Question 3.

QUESTION 3

Please state the percentage of fault, if any, with which you charge the following entities for factually causing harm to Michaelleen Lee:

You may only consider the fault of a party if you have answered "YES" as to negligence AND factual cause

Avon:	_____	%
Colgate Palmolive Company:	_____	%
Estee Lauder Inc.:	_____	%
Imi Fabi:	_____	%
Johnson & Johnson:	_____	%
Scholl's Wellness Co., LLC:	_____	%

TOTAL FAULT OF ALL PARTIES WHEN COMBINED MUST BE 100%

Please proceed to Question 4

QUESTION 4

Did Michaelleen Lee rely to her detriment on any statement of material fact that was made by Johnson & Johnson, to conceal or omit material information about the safety of the product at issue as proven by clear and convincing evidence?

YES NO

If you have answered "YES" to Question 4 please proceed to Question 5.
If you have answered "NO" to Question 4 please proceed to Question 6.

QUESTION 5

Was Michaelleen Lee's detrimental reliance on any statement of material fact made to conceal or omit material information by Johnson & Johnson about the safety of the product at issue a factual cause of harm to Michaelleen Lee?

YES NO

Please proceed to Question 6.

QUESTION 6

Did Michaelleen Lee rely to her detriment on any statement or conduct of material fact intentionally or negligently made by Johnson & Johnson which misrepresented the safety of the product at issue as proven by clear and convincing evidence?

YES NO

If you have answered "YES" to Question 6, please proceed to Question 7.
If you have answered "NO" to Question 6, please proceed to Question 8.

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QUESTION 7

Was Michaelleen Lee's detrimental reliance on any statement or conduct of material fact intentionally or negligently made by Johnson & Johnson misrepresenting the safety of the product at issue a factual cause of harm to Michaelleen Lee?

_____ YES  _____ NO

Only proceed to Question 8 if any of the following have occurred:

- a. If you have answered "YES" for any entity at Questions 1 & 2 and/or;
- b. If you answered "YES" for both Questions 4 & 5; and/or
- c. If you answered "YES" for both Questions 6 & 7.

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QUESTION 8

State the total amount of compensatory damages, if any, you find reasonably compensate Michaeleen Lee, Michelle Felton and Charles Lee for the harm sustained?

Wrongful Death \$ _____
(Michelle Felton's loss of advice and guidance, loss of her mother's emotional support and care, emotional and psychological loss as a result of her mother's death)

Wrongful Death \$ _____
(Charles Lee's loss of advice and guidance, loss of his mother's emotional support and care, emotional and psychological loss as a result of his mother's death)

Survival Claim \$ _____
(Mental and physical pain, suffering, embarrassment, inconvenience, & loss of life's pleasures of Michaeleen Lee)

Total Award (add above amounts) \$ _____

Please proceed to Question 9 only if you have answered one of the following as to Johnson & Johnson:

- a. "YES" as to Johnson & Johnson on Questions 1 & 2; and/or
- b. "YES" as to Questions 4 & 5; and/or
- c. "YES" as to Questions 6 & 7.

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QUESTION 9

Do you find Johnson & Johnson's conduct in this case warrants a finding of Punitive Damages?

 ✓ YES NO

If you have answered "NO" to Question 9 answer no further Questions. You have reached a verdict and the foreperson should sign and date the form. Please inform Court Staff you have reached a verdict.

If you have answered "YES" to Question 9, please proceed to Question 10

QUESTION 10

What amount of Punitive Damages, if any, do you award the Plaintiff's in this case?

\$ 22 million

FOREPERSON MUST SIGN AND DATE BELOW

 1-4-25
DATE


SIGNATURE OF FOREPERSON

Please advise the Court Officer you have reached a verdict.