

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

COURTNEY ALLEN and STEVEN
ALLEN, a married couple,

Plaintiffs,

v.

TODD ZONIS and the MARITAL
COMMUNITY OF TODD ZONIS and
JENNIFER ZONIS,

Defendants.

No. 15-2-15656-0 KNT
SPECIAL VERDICT FORM A
CLAIMS BY ALLENS

We, the jury, make the following answers to the questions submitted by the Court:

Allens' claim for Electronic Impersonation

QUESTION NO. 1: On the Allens' claim for Electronic Impersonation, did Todd Zonis Electronically Impersonate the Allens?

Answer: (please circle)

Yes

No

If you answered "yes" to Question 1, above, then answer Question 2 and following questions. If you answered "no," you should proceed to Question 4 and following questions.

QUESTION NO. 2: Was the electronic impersonation a proximate cause of the injury or damage to the Allens?

Answer: (please circle)

Yes

No

If you answered "yes" to Question 2, above, then answer Question 3 and following questions. If you answered "no," you should proceed to Question 4 and following questions.

ORIGINAL

QUESTION NO. 3: What do you find to be the total amount of damages for the electronic impersonation? (Do not consider the issue of contributory negligence, if any, in your answer.)

Answer: \$ 2,000,000

Allens' claim for Intentional Invasion of Privacy

QUESTION NO. 4: On the Allens' claim for Invasion of Privacy, did Todd Zonis intentionally invade the privacy of the Allens?

Answer: (please circle) Yes No

If you answered "yes" to Question 4, above, then answer Question 5 and following questions. If you answered "no," you should proceed to Question 8 and following questions.

QUESTION NO. 5: Was the invasion of privacy a proximate cause of the injury or damage to the Allens?

Answer: (please circle) Yes No

If you answered "yes" to Question 5, above, then answer Question 6 and following questions. If you answered "no," you should proceed to Question 8 and following questions.

QUESTION NO. 6: What do you find to be the total amount of damages for ~~the electronic impersonation?~~ (Do not consider the issue of contributory negligence, if any, in your answer.)

INVASION OF PRIVACY?

Answer: \$ 2,000,000

QUESTION NO. 7 Assume that 100% represents the total combined fault that proximately caused the Allens' injury. What percentage of this 100% is attributable to the Zonises and what percentage of this 100% is attributable to the contributory negligence, if any, of the Allens? Your total must equal 100%.

Answer:

Allens: 5 %

Zonises 95 %

Allens' claim for Outrage, the Intentional Infliction of Emotional Distress

QUESTION NO. 8 On the Allens' claim for Outrage, the Intentional Infliction of Emotional Distress, did Todd Zonis intentionally inflict emotional distress on the Allens?

Answer: (please circle) Yes No

If you answered "yes" to Question 8 above, then answer Question 9 and following questions. If you answered "no," you should proceed to Question 12 and following questions.

QUESTION NO. 9: Was the intentional infliction of emotional distress a proximate cause of the injury or damage to the Allens?

Answer: (please circle) Yes No

QUESTION NO. 10: What do you find to be the total amount of damages for the intentional infliction of emotional distress? (Do not consider the issue of contributory negligence, if any, in your answer.)

Answer: \$ 3,000,000

QUESTION NO. 11: Assume that 100% represents the total combined fault that proximately caused the Allens' injury. What percentage of this 100% is attributable to the Zonises and what percentage of this 100% is attributable to the contributory negligence, if any, of the Allens? Your total must equal 100%.

Answer:

Allens: 0 %
Zonises 100 %

Allens' claim for Defamation

QUESTION NO. 12 On the Allens' claim for Defamation, did Todd Zonis defame the Allens?

Answer: (please circle) Yes No

If you answered "yes" to Question 12, above, then answer Question 13 and following questions. If you answered "no," you should proceed to the end of this form, sign the form.

QUESTION NO. 13 Was the defamation a proximate cause of the injury or damage to the Allens?

Answer: (please circle)

Yes

No

If you answered "yes" to Question 13, above, then answer Question 14 and following questions. If you answered "no," you should proceed to the end of this form, sign the form.

QUESTION NO. 14: What do you find to be the total amount of damages for the defamation? (Do not consider the issue of contributory negligence, if any, in your answer.)

Answer:

\$2,000,000

The presiding juror should sign and return this Special Verdict Form.

DATED: 3/31/17


PRESIDING JUROR

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COURTNEY ALLEN and STEVEN ALLEN, a married couple,

Plaintiffs,

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TODD ZONIS and the MARITAL COMMUNITY OF TODD ZONIS and JENNIFER ZONIS,

Defendants.

No. 15-2-15656-0 KNT
SPECIAL VERDICT FORM B
COUNTERCLAIMS BY ZONISES

We, the jury, make the following answers to the questions submitted by the Court:

Zonises' counterclaim for Public Disclosure of Private Facts

QUESTION NO. 1: On the Zonises' claim for Public Disclosure of Private Facts, did the Allens publically disclose private facts of the Zonises?

Answer: (please circle)

Yes

No

If you answered "yes" to Question 1, above, then answer Question 2 and following questions.
If you answered "no," you should proceed to Question ~~3~~ ⁶ and following questions.

QUESTION NO. 2: Did the Allens have a qualified privilege to disclose those facts which permitted the Allens to make the comments which Zonises claim were private facts?

Answer: (please circle)

Yes

No

ORIGINAL

If you answered "yes" to Question 2, above, then answer Question 6 and following questions. If you answered "no," you should proceed to Question 3 and following questions.

QUESTION NO. 3: Was the Public Disclosure of Private Facts a proximate cause of the injury or damage to the Zonises?

Answer: (please circle) Yes No

QUESTION NO. 4: What do you find to be the total amount of damages for the Public Disclosure of Private Facts? (Do not consider the issue of contributory negligence, if any, in your answer.)

Answer: \$ _____

QUESTION NO. 5: Assume that 100% represents the total combined fault that proximately caused the Zonises injury. What percentage of this 100% is attributable to the Allens and what percentage of this 100% is attributable to the contributory negligence, if any, of the Zonises?? Your total must equal 100%.

Answer:

Zonises: _____ %

Allens _____ %

Zonises' counterclaim for Intrusion upon Seclusion

QUESTION NO. 6: On the Zonises' claim for Intrusion upon Seclusion, did the Allens intrude upon the seclusion as of the Zonises?

Answer: (please circle) Yes No

If you answered "yes" to Question 6, above, then answer Question 7 and following questions. If you answered "no," you should proceed to Question 10 and following questions.

QUESTION NO. 7: Was the intrusion upon seclusion a proximate cause of the injury or damage to the Zonises?

Answer: (please circle) Yes No

If you answered “yes” to Question 7, above, then answer Question 8 and following questions. If you answered “no,” you should proceed to Question 10 and following questions.

QUESTION NO. 8: What do you find to be the total amount of damages for the intrusion upon seclusion? (Do not consider the issue of contributory negligence, if any, in your answer.)

Answer: \$ _____

QUESTION NO. 9 Assume that 100% represents the total combined fault that proximately caused the Zonises injury. What percentage of this 100% is attributable to the Allens’ and what percentage of this 100% is attributable to the contributory negligence, if any, of the Zonises? Your total must equal 100%.

Answer:

Zonises: _____ %

Allens _____ %

Zonises counterclaim for Outrage, the Intentional Infliction of Emotional Distress

QUESTION NO. 10 On the Zonises’ claim for Outrage, the Intentional Infliction of Emotional Distress, did the Allens’ intentionally inflict emotional distress on the Zonises?

Answer: (please circle)

Yes

No

If you answered “yes” to Question 10 above, then answer Question 11 and following questions. If you answered “no,” you should proceed to the end and sign this form.

QUESTION NO. 11: Was the intentional infliction of emotional distress by the Allens a proximate cause of the injury or damage to the Zonises?

Answer: (please circle)

Yes

No

QUESTION NO. 12: What do you find to be the total amount of damages for the intentional infliction of emotional distress? (Do not consider the issue of contributory negligence, if any, in your answer.)

Answer: \$ _____

QUESTION NO. 13: Assume that 100% represents the total combined fault that proximately caused the Zonises' injury. What percentage of this 100% is attributable to the Allens and what percentage of this 100% is attributable to the contributory negligence, if any, of the Zonises? Your total must equal 100%.

Answer:

Zonises _____ %

Allens _____ %

The presiding juror should sign and return the Special Verdict Form.

DATED: 3/31/17


PRESIDING JUROR