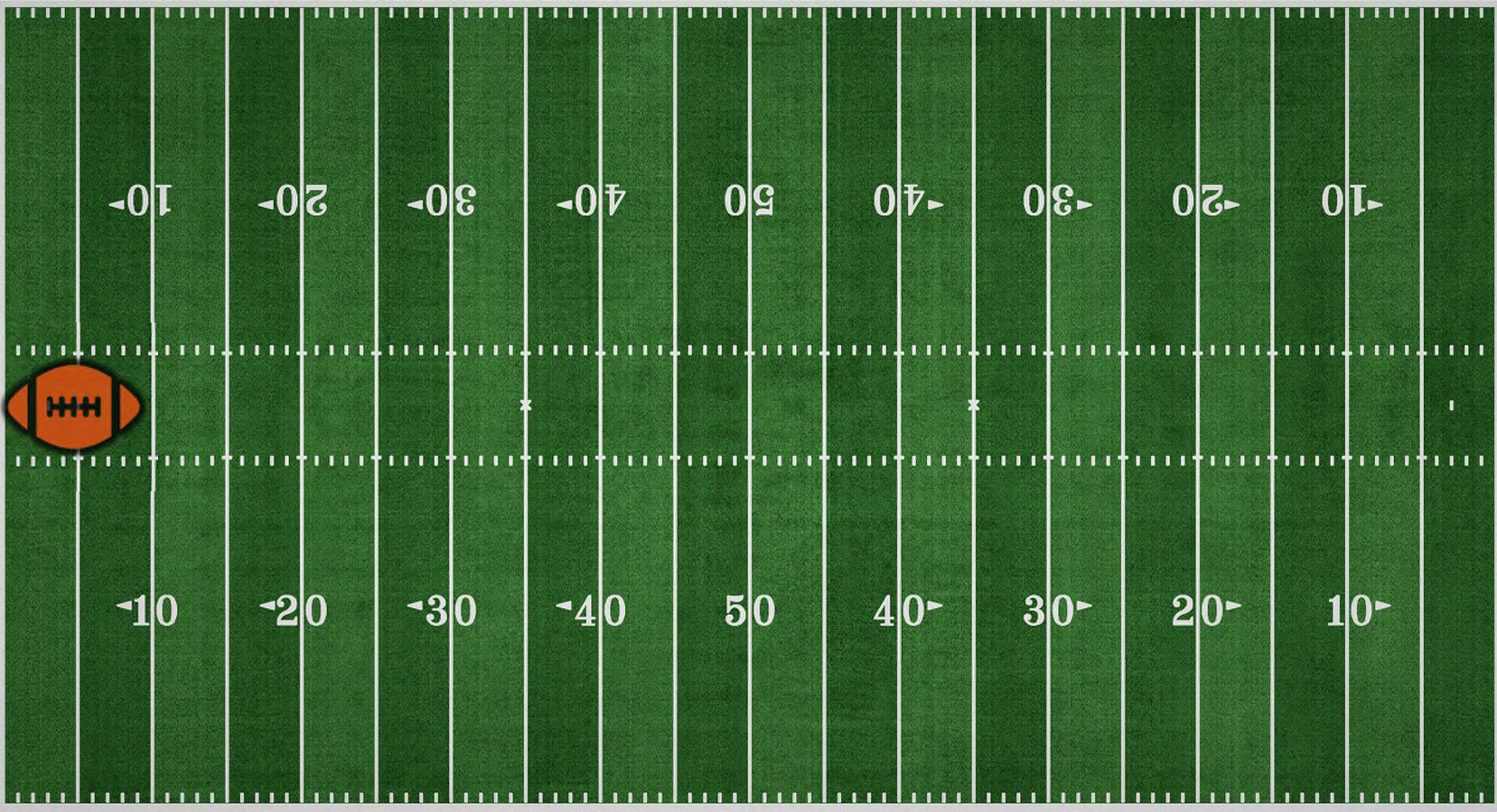




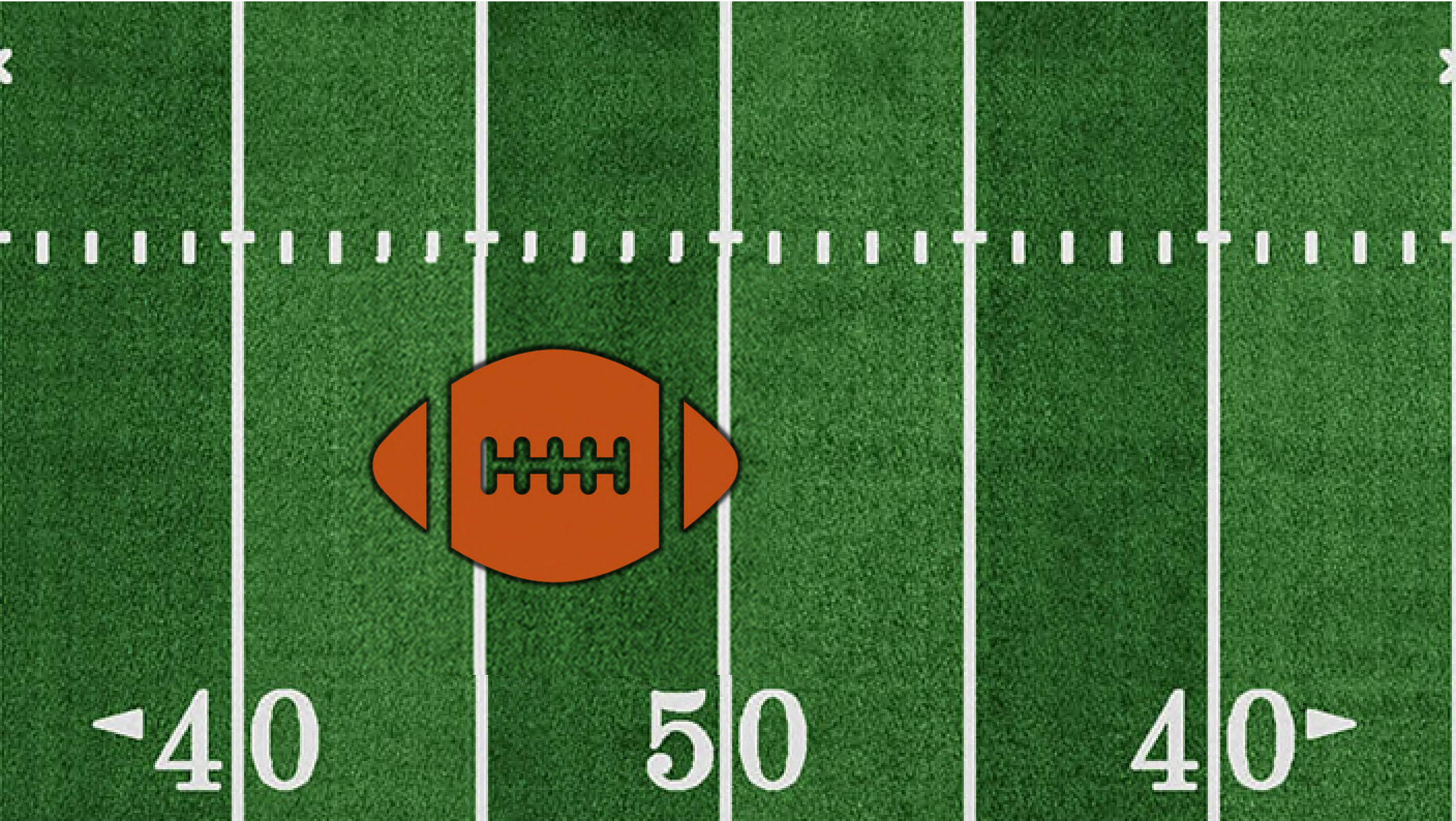
# Show, Don't Tell:

Using Visuals That Make a Difference by Rob Choi

DEFENDANT



PLAINTIFF



40

50

40

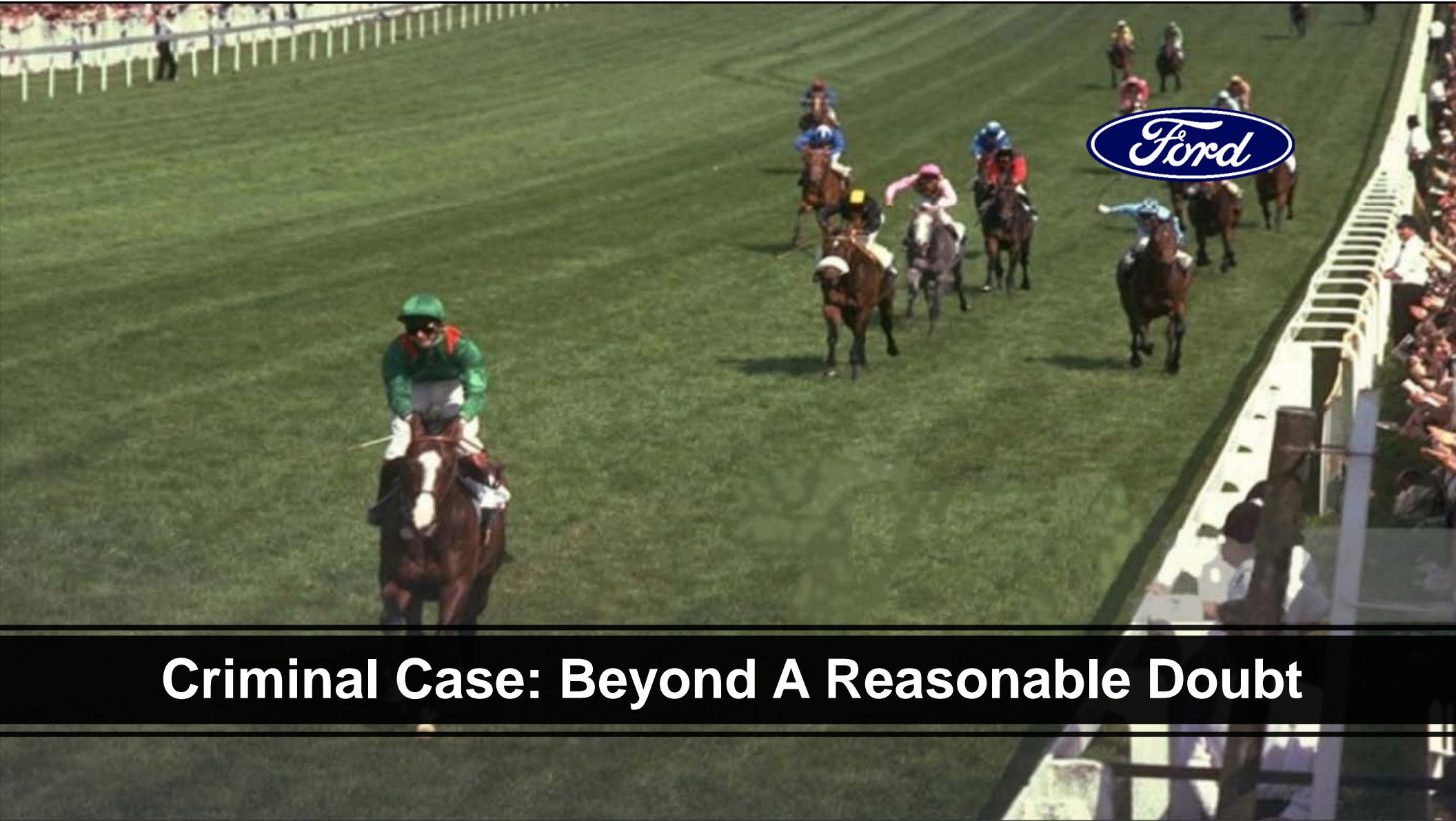




More Likely  
Than Not

# Not A Criminal Case





**Criminal Case: Beyond A Reasonable Doubt**



**Civil Case: Preponderance of the Evidence**

# \_\_\_\_\_ : Timeline of Events

**7/13/2020:**

*Date of Collision*

- Mr. \_\_\_\_ was in the rear-seat of an Uber with his seat belt on
- The Uber driver went the wrong way on the highway and collided head-on with another vehicle and then collided with two more vehicles
- EMS arrived to the scene and noted Mr. \_\_\_\_ was unresponsive
- Mr. \_\_\_\_ cut out of seatbelt with prolonged extraction from Uber vehicle
- Emergently transported to University Hospital in Newark, New Jersey
- Pulses were lost and recovered following a round of resuscitations and compressions



JULY  
2020

**7/13/2020:**  
Date of Collision



**7/13/2020:**

*Summary of Traumatic Injuries*

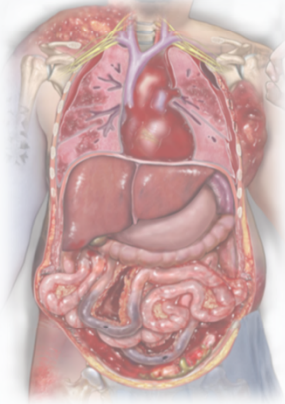
- Neck, multiple ribs, and upper spine fractures
- Clavicle dislocation
- Right brachial plexus nerves torn
- Respiratory failure
- Lack of oxygen to brain
- Extensive internal bleeding in chest, neck, and abdomen
- Traumatic herniation of bowels through ruptured abdominal wall
- Small bowel and colon ruptures with spillage of stool into abdomen
- Paralysis of right upper extremity with total loss of motor and sensory function



**7/13/2020:**  
Date of Collision



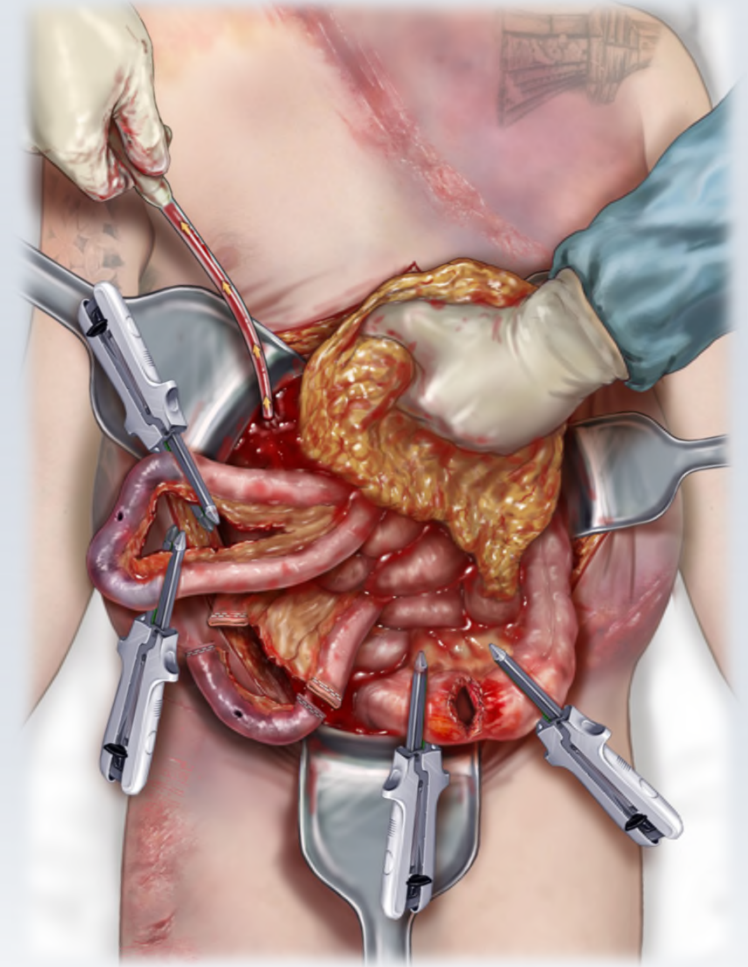
**7/13/2020:**  
Summary of Traumatic Injuries



**7/13/2020:**

*Surgery: Exploratory Laparotomy*

- Two segments of the perforated small bowel and one segment of the sigmoid colon resected
- ABThera wound VAC placed

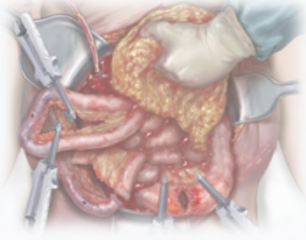


JULY  
2020

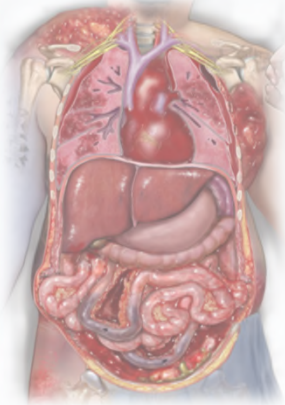
**7/13/2020:**  
Date of Collision



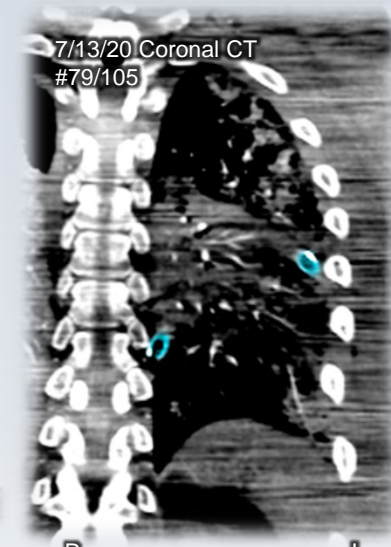
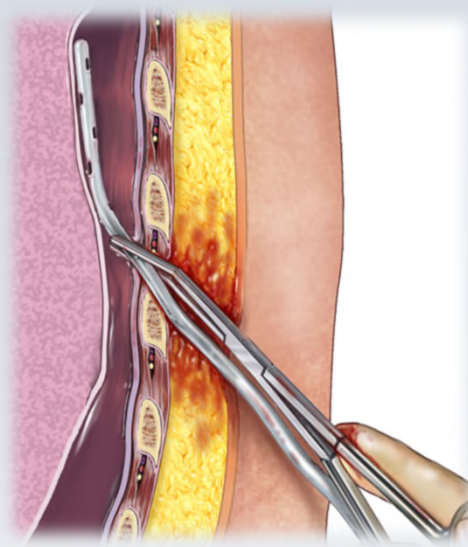
**7/13/2020:**  
Surgery: Exploratory Laparotomy



**7/13/2020:**  
Summary of Traumatic Injuries



**7/13/2020:**  
Surgery: Right Chest Tube Placement  
- Chest tube place between the 5th and 6th ribs on the right side.



7/13/20 Coronal CT  
#79/105

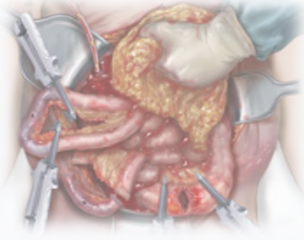
R

L

**7/13/2020:**  
Date of Collision



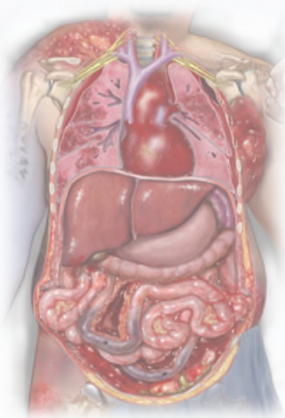
**7/13/2020:**  
Surgery: Exploratory Laparotomy



**7/13/2020:**  
Surgery: Right Chest Tube Placement



**7/13/2020:**  
Summary of Traumatic Injuries



**7/13/2020:**

**Surgery: Interventional Radiology (IR)  
Embolization of The Left Kidney**

- Mr. \_\_\_ taken to IR for embolization of the left kidney inferior pole as bleeding could not easily be accessed in operating room

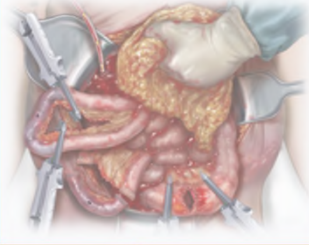
7/13/20 Coronal CT  
#79105

JULY  
2020

**7/13/2020:**  
Date of Collision

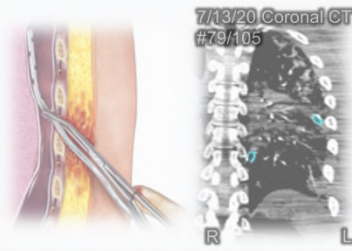


**7/13/2020:**  
Surgery: Exploratory Laparotomy

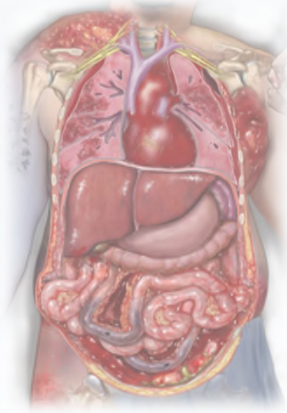


**7/14/2020:**  
Surgery: Central line and arterial line insertion

**7/13/2020:**  
Surgery: Right Chest Tube Placement



**7/13/2020:**  
Summary of Traumatic Injuries



**7/13/2020:**  
Surgery: Interventional Radiology (IR)  
Embolization of The Left Kidney

JULY  
2020

**KEY TO  
TREATMENT PROVIDERS**

- Sentara VaBch General Hospital
- First Colonial Family Practice / Urgent Care
- Virginia Beach Neurology
- Magee-Rosenblum Plastic Surgery
- Gershon Pain Specialists
- Physical Therapy Chiropractic Therapy
- Imaging
- Peter Guhl, O.D.
- Center for Neurorehabilitation Services
- Sentara Neurology
- The Hartford
- Wow Vision Therapy
- Ophthalmologic / Other
- Paul Smucker, M.D.
- Brain Resource
- Amen Clinics
- Willow Path Counseling Services
- Performance Test/IME

# Ms. \_\_\_\_\_ : Calendars of Treatment

**2014**

JANUARY							JULY						
5	6	7	8	9	10	11	6	7	8	9	10	11	12
12	13	14	15	16	17	18	13	14	15	16	17	18	19
19	20	21	22	23	24	25	20	21	22	23	24	25	26
26	27	28	29	30	31	1	27	28	29	30	31		

FEBRUARY							AUGUST						
2	3	4	5	6	7	8	3	4	5	6	7	8	9
9	10	11	12	13	14	15	10	11	12	13	14	15	16
16	17	18	19	20	21	22	17	18	19	20	21	22	23
23	24	25	26	27	28	1	24	25	26	27	28	29	30

MARCH							SEPTEMBER						
2	3	4	5	6	7	8	31	1	2	3	4	5	6
9	10	11	12	13	14	15	7	8	9	10	11	12	13
16	17	18	19	20	21	22	14	15	16	17	18	19	20
23	24	25	26	27	28	29	21	22	23	24	25	26	27
30	31						28	29	30				

APRIL							OCTOBER						
6	7	8	9	10	11	12	5	6	7	8	9	10	11
13	14	15	16	17	18	19	12	13	14	15	16	17	18
20	21	22	23	24	25	26	19	20	21	22	23	24	25
27	28	29	30				26	27	28	29	30	31	1

MAY							NOVEMBER						
4	5	6	7	8	9	10	9	10	11	12	13	14	15
11	12	13	14	15	16	17	16	17	18	19	20	21	22
18	19	20	21	22	23	24	23	24	25	26	27	28	29
25	26	27	28	29	30	31	30						

JUNE							DECEMBER						
8	9	10	11	12	13	14	7	8	9	10	11	12	13
15	16	17	18	19	20	21	14	15	16	17	18	19	20
22	23	24	25	26	27	28	21	22	23	24	25	26	27
29	30						28	29	30	31			

**2015**

JANUARY							JULY						
4	5	6	7	8	9	10	5	6	7	8	9	10	11
11	12	13	14	15	16	17	12	13	14	15	16	17	18
18	19	20	21	22	23	24	19	20	21	22	23	24	25
25	26	27	28	29	30	31	26	27	28	29	30	31	1

FEBRUARY							AUGUST						
1	2	3	4	5	6	7	2	3	4	5	6	7	8
8	9	10	11	12	13	14	9	10	11	12	13	14	15
15	16	17	18	19	20	21	16	17	18	19	20	21	22
22	23	24	25	26	27	28	23	24	25	26	27	28	29
							30	31					

MARCH							SEPTEMBER						
1	2	3	4	5	6	7	1	2	3	4	5	6	7
8	9	10	11	12	13	14	6	7	8	9	10	11	12
15	16	17	18	19	20	21	13	14	15	16	17	18	19
22	23	24	25	26	27	28	20	21	22	23	24	25	26
29	30	31					27	28	29	30			

APRIL							OCTOBER						
5	6	7	8	9	10	11	4	5	6	7	8	9	10
12	13	14	15	16	17	18	11	12	13	14	15	16	17
19	20	21	22	23	24	25	18	19	20	21	22	23	24
26	27	28	29	30			25	26	27	28	29	30	31

MAY							NOVEMBER						
3	4	5	6	7	8	9	8	9	10	11	12	13	14
10	11	12	13	14	15	16	15	16	17	18	19	20	21
17	18	19	20	21	22	23	22	23	24	25	26	27	28
24	25	26	27	28	29	30	29	30					

JUNE							DECEMBER						
7	8	9	10	11	12	13	6	7	8	9	10	11	12
14	15	16	17	18	19	20	13	14	15	16	17	18	19
21	22	23	24	25	26	27	20	21	22	23	24	25	26
28	29	30					27	28	29	30	31		

**2016**

JANUARY							JULY						
3	4	5	6	7	8	9	3	4	5	6	7	8	9
10	11	12	13	14	15	16	10	11	12	13	14	15	16
17	18	19	20	21	22	23	17	18	19	20	21	22	23
24	25	26	27	28	29	30	24	25	26	27	28	29	30

FEBRUARY							AUGUST						
31	1	2	3	4	5	6	31	1	2	3	4	5	6
7	8	9	10	11	12	13	7	8	9	10	11	12	13
14	15	16	17	18	19	20	14	15	16	17	18	19	20
21	22	23	24	25	26	27	21	22	23	24	25	26	27
28	29						28	29	30	31			

MARCH							SEPTEMBER						
6	7	8	9	10	11	12	4	5	6	7	8	9	10
13	14	15	16	17	18	19	11	12	13	14	15	16	17
20	21	22	23	24	25	26	18	19	20	21	22	23	24
27	28	29	30	31			25	26	27	28	29	30	1

APRIL							OCTOBER						
3	4	5	6	7	8	9	9	10	11	12	13	14	15
10	11	12	13	14	15	16	16	17	18	19	20	21	22
17	18	19	20	21	22	23	23	24	25	26	27	28	29
24	25	26	27	28	29	30	30	31					

MAY							NOVEMBER						
1	2	3	4	5	6	7	1	2	3	4	5	6	7
8	9	10	11	12	13	14	6	7	8	9	10	11	12
15	16	17	18	19	20	21	13	14	15	16	17	18	19
22	23	24	25	26	27	28	20	21	22	23	24	25	26
29	30	31					27	28	29	30			

JUNE							DECEMBER						
5	6	7	8	9	10	11	4	5	6	7	8	9	10
12	13	14	15	16	17	18	11	12	13	14	15	16	17
19	20	21	22	23	24	25	18	19	20	21	22	23	24
26	27	28	29	30			25	26	27	28	29	30	31

**2017**

JANUARY							JULY						
8	9	10	11	12	13	14	9	10	11	12	13	14	15
15	16	17	18	19	20	21	16	17	18	19	20	21	22
22	23	24	25	26	27	28	23	24	25	26	27	28	29
29	30	31					30	31					

FEBRUARY							AUGUST						
5	6	7	8	9	10	11	6	7	8	9	10	11	12
12	13	14	15	16	17	18	13	14	15	16	17	18	19
19	20	21	22	23	24	25	20	21	22	23	24	25	26
26	27	28					27	28	29	30	31		

MARCH							SEPTEMBER						
5	6	7	8	9	10	11	3	4	5	6	7	8	9
12	13	14	15	16	17	18	10	11	12	13	14	15	16
19	20	21	22	23	24	25	17	18	19	20	21	22	23
26	27	28	29	30	31	1	24	25	26	27	28	29	30

APRIL							OCTOBER						
2	3	4	5	6	7	8	1	2	3	4	5	6	7
9	10	11	12	13	14	15	8	9	10	11	12	13	14
16	17	18	19	20	21	22	15	16	17	18	19	20	21
23	24	25	26	27	28	29	22	23	24	25	26	27	28
30							29	30	31				

MAY							NOVEMBER						
4	5	6	7	8	9	10	7	8	9	10	11	12	13
14	15	16	17	18	19	20	12	13	14	15	16	17	18
21	22	23	24	25	26	27	19	20	21	22	23	24	25
28	29	30	31				26	27	28	29	30		

JUNE							DECEMBER						
4	5	6	7	8	9	10	3	4	5	6	7	8	9
11	12	13	14	15	16	17	10	11	12	13	14	15	16
18	19	20	21										



**KEY TO  
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- Peter Guhl, O.D.
- Center for Neurorehabilitation Services
- Sentara Neurology
- The Hartford
- Wow Vision Therapy
- Ophthalmologic / Other
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- Brain Resource
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- Willow Path Counseling Services
- Performance Test/IME

# Ms. \_\_\_\_\_: Calendars of Treatment

**2022**

JANUARY							JULY						
2	3	4	5	6	7	8	3	4	5	6	7	8	9
9	10	11	12	13	14	15	10	11	12	13	14	15	16
16	17	18	19	20	21	22	17	18	19	20	21	22	23
23	24	25	26	27	28	29	24	25	26	27	28	29	30
30	31												
FEBRUARY					AUGUST								
	1	2	3	4	5	31	1	2	3	4	5	6	
6	7	8	9	10	11	12	7	8	9	10	11	12	13
13	14	15	16	17	18	19	14	15	16	17	18	19	20
20	21	22	23	24	25	26	21	22	23	24	25	26	27
27	28						28	29	30	31			
MARCH					SEPTEMBER								
	1	2	3	4	5		1	2	3	4	5	6	
6	7	8	9	10	11	12	4	5	6	7	8	9	10
13	14	15	16	17	18	19	11	12	13	14	15	16	17
20	21	22	23	24	25	26	18	19	20	21	22	23	24
27	28	29	30	31			25	26	27	28	29	30	1
APRIL					OCTOBER								
				1	2	2	3	4	5	6	7	8	
3	4	5	6	7	8	9	9	10	11	12	13	14	15
10	11	12	13	14	15	16	16	17	18	19	20	21	22
17	18	19	20	21	22	23	23	24	25	26	27	28	29
24	25	26	27	28	29	30	30	31					
MAY					NOVEMBER								
1	2	3	4	5	6	7		1	2	3	4	5	
8	9	10	11	12	13	14	6	7	8	9	10	11	12
15	16	17	18	19	20	21	13	14	15	16	17	18	19
22	23	24	25	26	27	28	20	21	22	23	24	25	26
29	30	31					27	28	29	30			
JUNE					DECEMBER								
			1	2	3	4		1	2	3	4	5	6
5	6	7	8	9	10	11	4	5	6	7	8	9	10
12	13	14	15	16	17	18	11	12	13	14	15	16	17
19	20	21	22	23	24	25	18	19	20	21	22	23	24
26	27	28	29	30			25	26	27	28	29	30	31

**2023**

JANUARY							JULY							
1	2	3	4	5	6	7	2	3	4	5	6	7	8	
8	9	10	11	12	13	14	9	10	11	12	13	14	15	
15	16	17	18	19	20	21	16	17	18	19	20	21	22	
22	23	24	25	26	27	28	23	24	25	26	27	28	29	
29	30	31					30	31						
FEBRUARY							AUGUST							
								1	2	3	4	5	6	
5	6	7	8	9	10	11	6	7	8	9	10	11	12	
12	13	14	15	16	17	18	13	14	15	16	17	18	19	
19	20	21	22	23	24	25	20	21	22	23	24	25	26	
26	27	28					27	28	29	30	31			
MARCH							SEPTEMBER							
5	6	7	8	9	10	11	3	4	5	6	7	8	9	
12	13	14	15	16	17	18	10	11	12	13	14	15	16	
19	20	21	22	23	24	25	17	18	19	20	21	22	23	
26	27	28	29	30	31	1	24	25	26	27	28	29	30	
APRIL							OCTOBER							
								1	2	3	4	5	6	7
2	3	4	5	6	7	8	2	3	4	5	6	7	8	9
9	10	11	12	13	14	15	9	10	11	12	13	14	15	16
16	17	18	19	20	21	22	16	17	18	19	20	21	22	23
23	24	25	26	27	28	29	23	24	25	26	27	28	29	30
30							30	31						
MAY							NOVEMBER							
								1	2	3	4	5	6	7
7	8	9	10	11	12	13	5	6	7	8	9	10	11	12
14	15	16	17	18	19	20	12	13	14	15	16	17	18	19
21	22	23	24	25	26	27	19	20	21	22	23	24	25	26
28	29	30	31				26	27	28	29	30			
JUNE							DECEMBER							
4	5	6	7	8	9	10	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	10	11	12	13	14	15	16	17
18	19	20	21	22	23	24	17	18	19	20	21	22	23	24
25	26	27	28	29	30	1	24	25	26	27	28	29	30	31

**2024**

JANUARY						JULY								
31	1	2	3	4	5	6	1	2	3	4	5	6		
7	8	9	10	11	12	13	7	8	9	10	11	12	13	
14	15	16	17	18	19	20	14	15	16	17	18	19	20	
21	22	23	24	25	26	27	21	22	23	24	25	26	27	
28	29	30	31				28	29	30	31				
FEBRUARY						AUGUST								
								1	2	3	4	5	6	
4	5	6	7	8	9	10	4	5	6	7	8	9	10	
11	12	13	14	15	16	17	11	12	13	14	15	16	17	
18	19	20	21	22	23	24	18	19	20	21	22	23	24	
25	26	27	28	29			25	26	27	28	29	30	31	
MARCH						SEPTEMBER								
								1	2	3	4	5	6	7
3	4	5	6	7	8	9	3	4	5	6	7	8	9	10
10	11	12	13	14	15	16	10	11	12	13	14	15	16	17
17	18	19	20	21	22	23	17	18	19	20	21	22	23	24
24	25	26	27	28	29	30	24	25	26	27	28	29	30	
APRIL						OCTOBER								
31	1	2	3	4	5	6		1	2	3	4	5	6	7
7	8	9	10	11	12	13	6	7	8	9	10	11	12	13
14	15	16	17	18	19	20	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	20	21	22	23	24	25	26	27
28	29	30					27	28	29	30	31			
MAY						NOVEMBER								
								1	2	3	4	5	6	7
5	6	7	8	9	10	11	3	4	5	6	7	8	9	10
12	13	14	15	16	17	18	10	11	12	13	14	15	16	17
19	20	21	22	23	24	25	17	18	19	20	21	22	23	24
26	27	28	29	30	31	1	24	25	26	27	28	29	30	
JUNE						DECEMBER								
								1	2	3	4	5	6	7
9	10	11	12	13	14	15	8	9	10	11	12	13	14	15
16	17	18	19	20	21	22	15	16	17	18	19	20	21	22
23	24	25	26	27	28	29	22	23	24	25	26	27	28	29
30							29	30	31					

**2025**

JANUARY					JULY								
			1	2	3	4	6	7	8	9	10	11	12
12	13	14	15	16	17	18	13	14	15	16	17	18	19
19	20	21	22	23	24	25	19	20	21	22	23	24	25
26	27	28	29	30	31	1	26	27	28	29	30	31	
FEBRUARY					AUGUST								
								1	2	3	4	5	6
2	3	4	5	6	7	8	3	4	5	6	7	8	9
9	10	11	12	13	14	15	10	11	12	13	14	15	16
16	17	18	19	20	21	22	17	18	19	20	21	22	23
23	24	25	26	27	28	29	24	25	26	27	28	29	30
MARCH					SEPTEMBER								
								1	2	3	4	5	6
2	3	4	5	6	7	8	31	1	2	3	4	5	6
9	10	11	12	13	14	15	7	8	9	10	11	12	13
16	17	18	19	20	21	22	14	15	16	17	18	19	20
23	24	25	26	27	28	29	21	22	23	24	25	26	27
30	31						28	29	30				
APRIL					OCTOBER								
								1	2	3	4	5	6
6	7	8	9	10	11	12	6	7	8	9	10	11	12
13	14	15	16	17	18	19	13	14	15	16	17	18	1

**58** DAYS OF  
PHYSICAL / CHIROPRACTIC THERAPY



**42** PRIMARY CARE /  
SPECIALIST VISITS



**28** NEUROLOGY  
VISITS



**AFTER  
INCIDENT**

**218 +**  
MEDICAL  
TREATMENTS

**6** PAIN MANAGEMENT  
VISITS



**41** PSYCHIATRY / PSYCHOTHERAPY  
VISITS



**3** IMAGING  
APPOINTMENTS



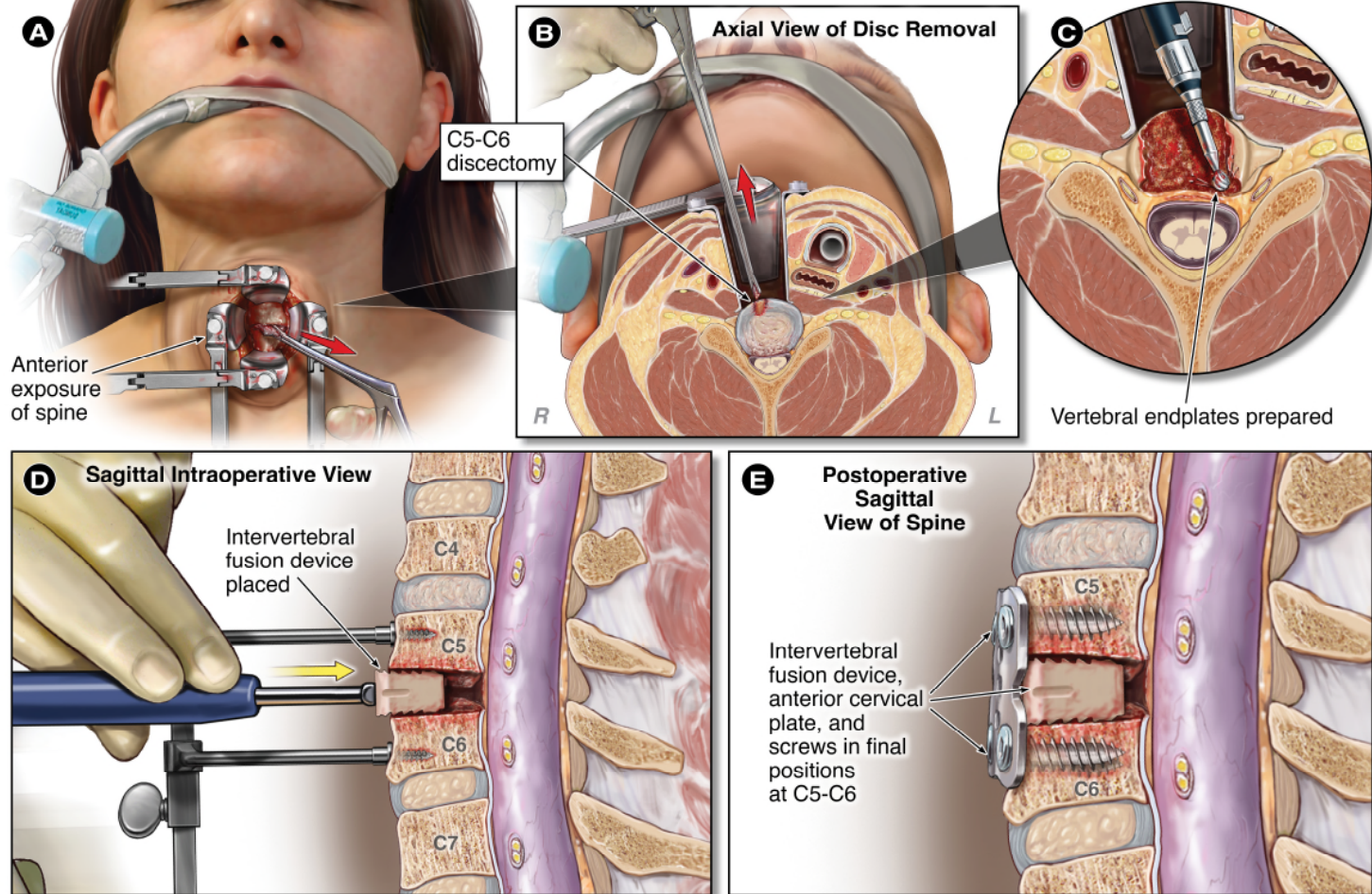
**2** URGENT CARE

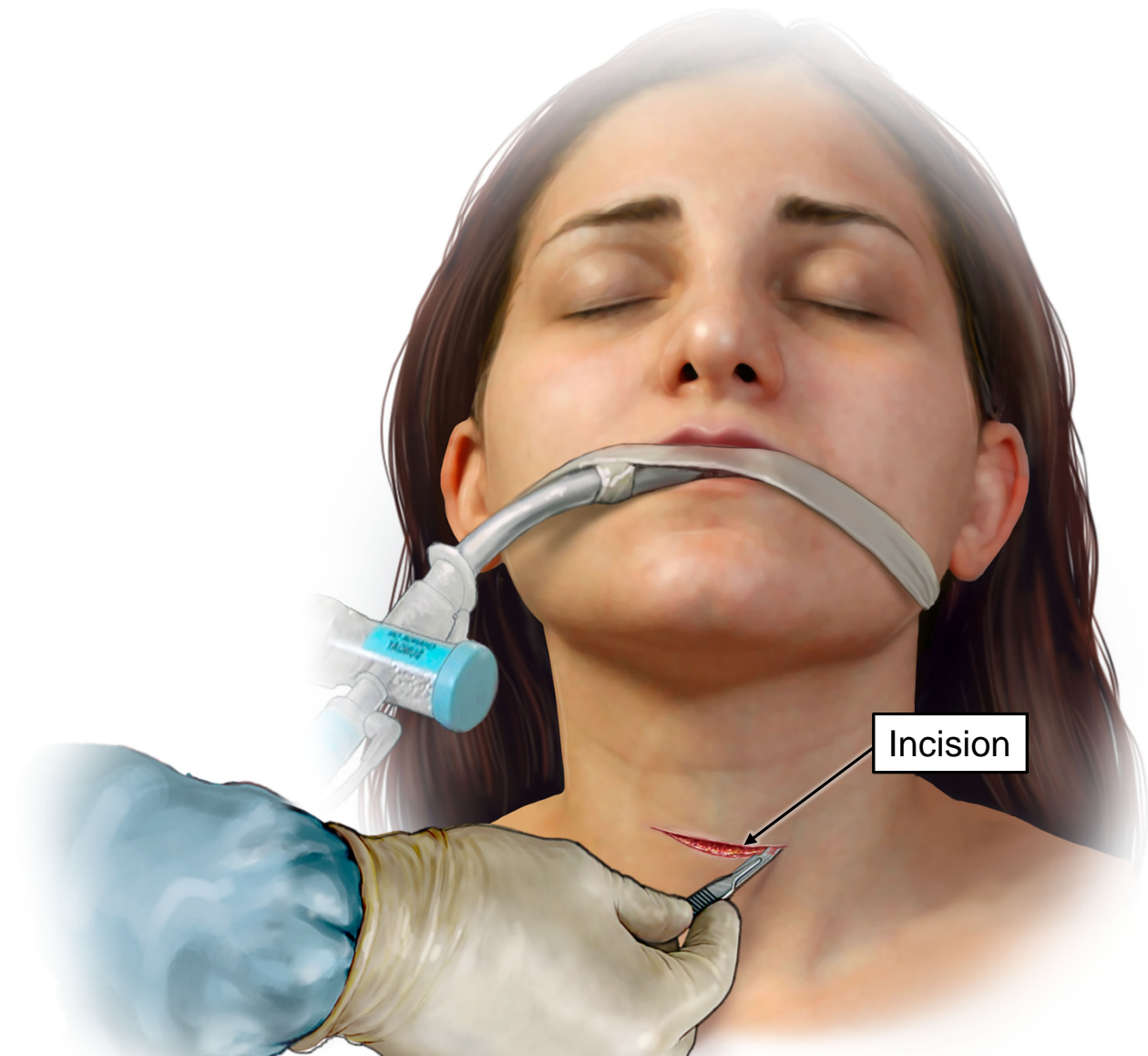


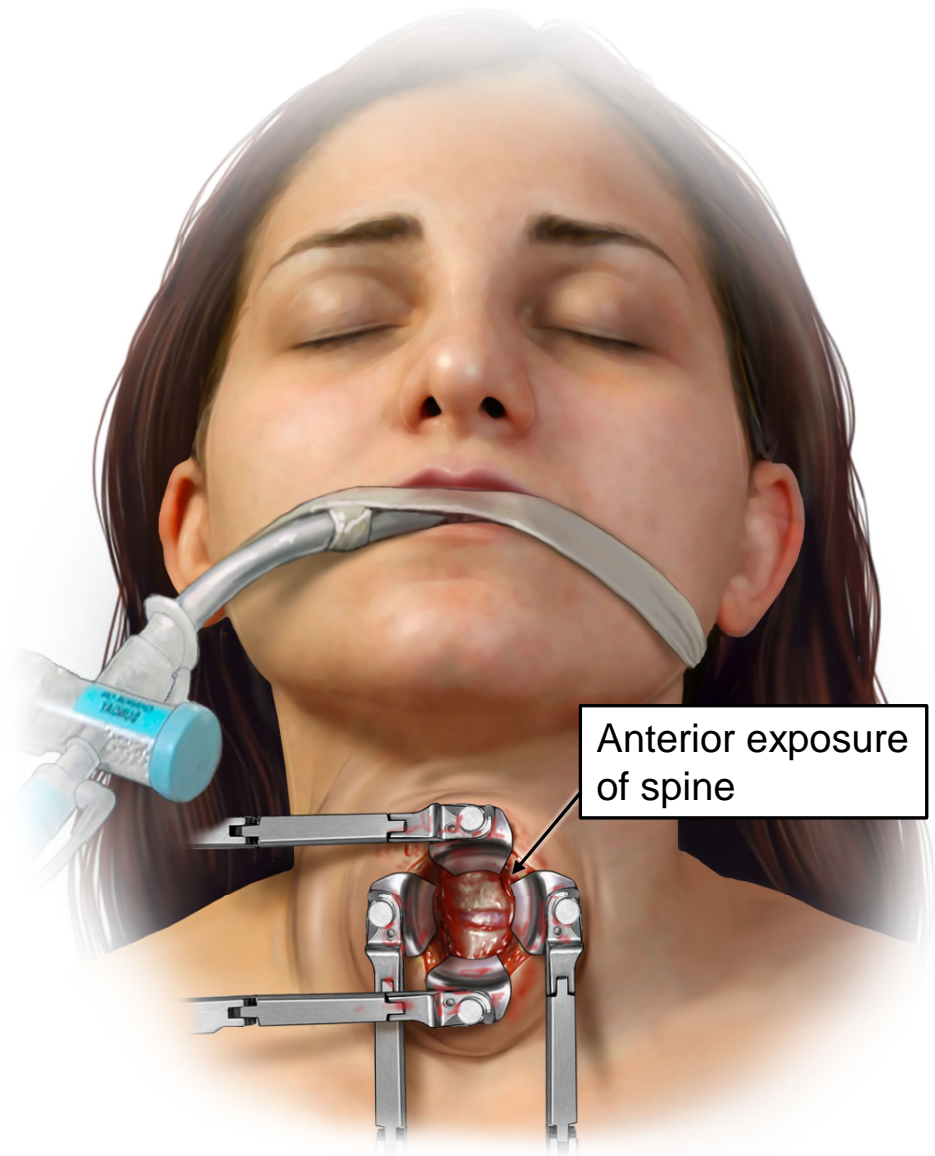
**38** VISION THERAPY  
VISITS



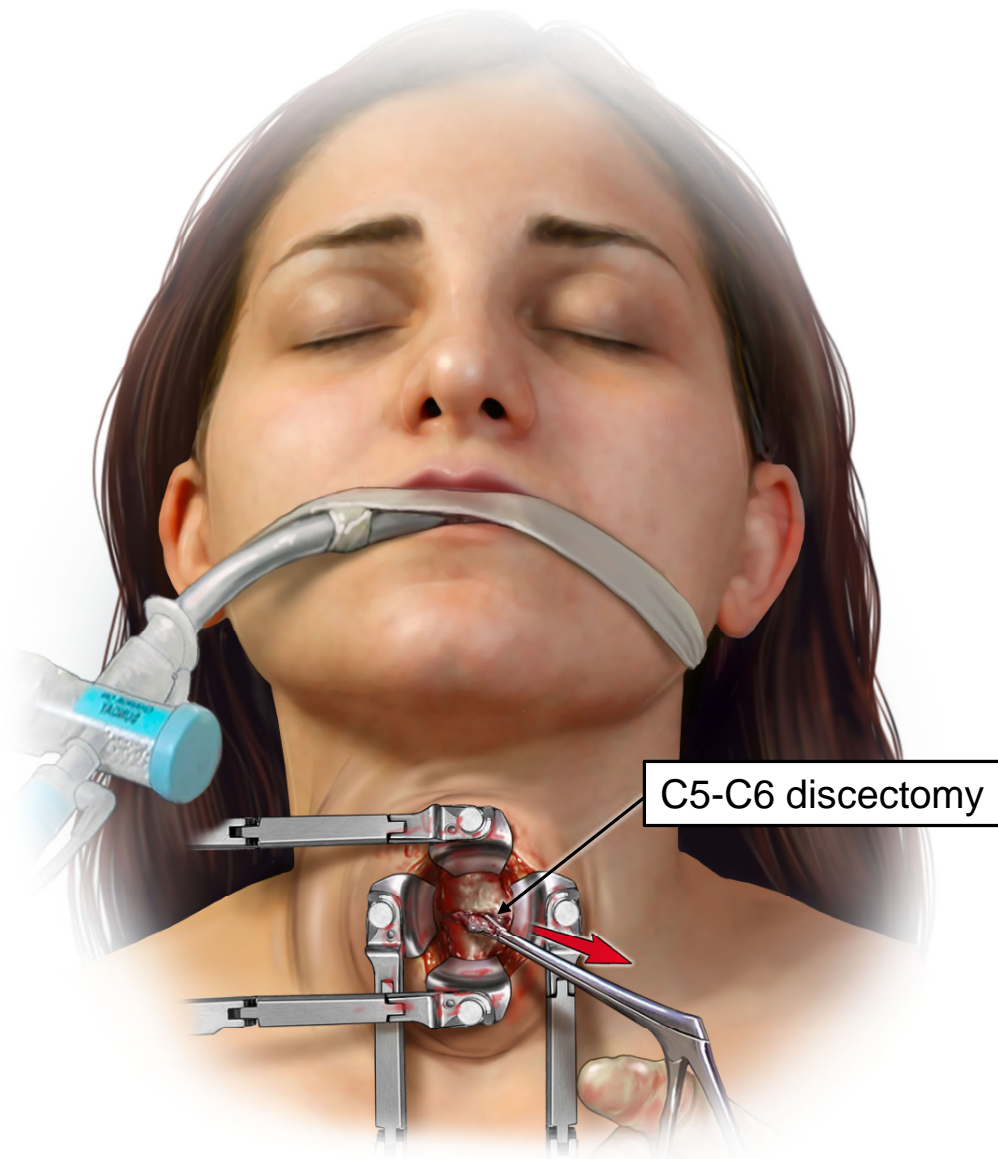
# Ms. \_\_\_\_\_: Future C5-C6 Anterior Cervical Discectomy & Fusion

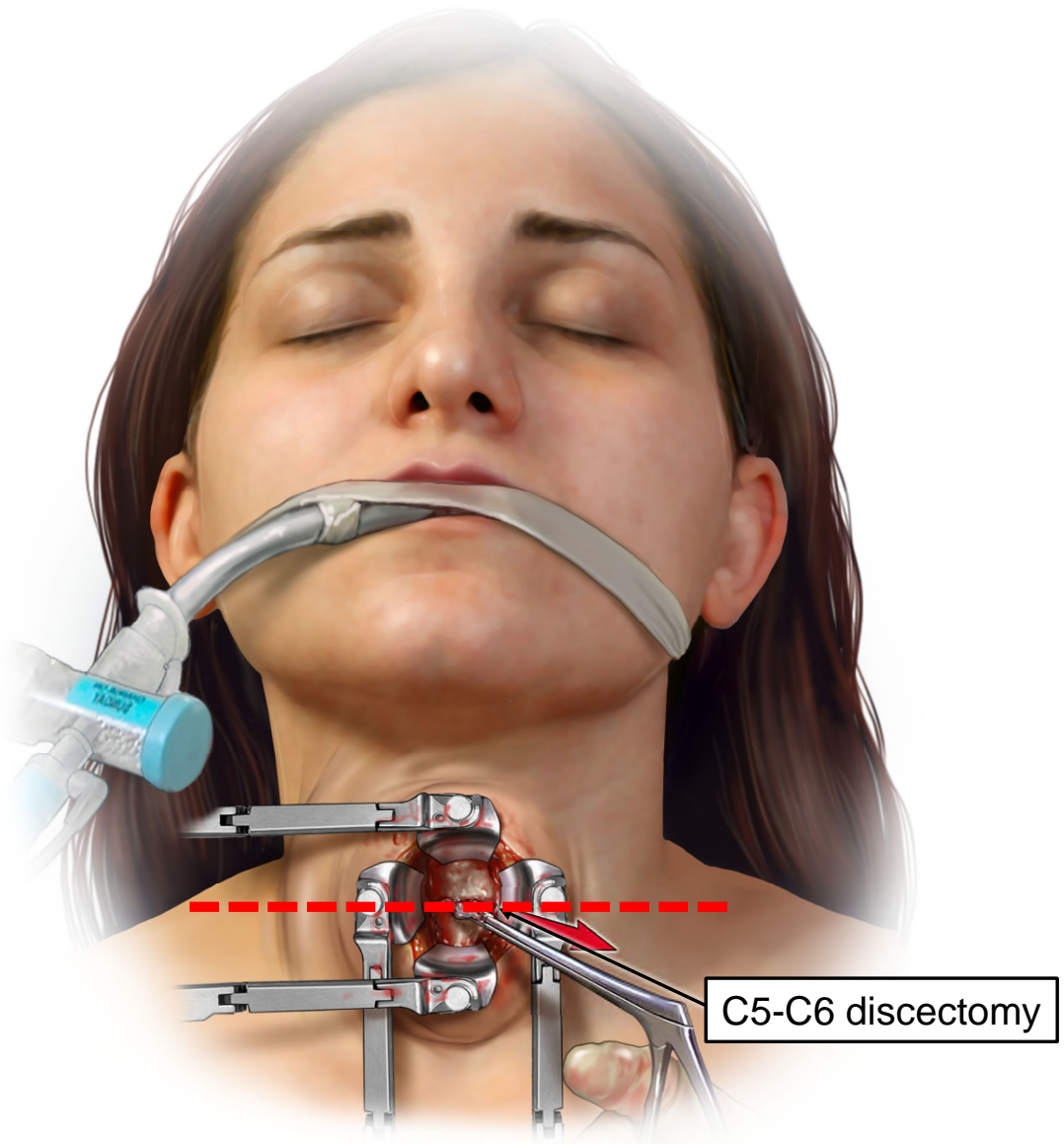




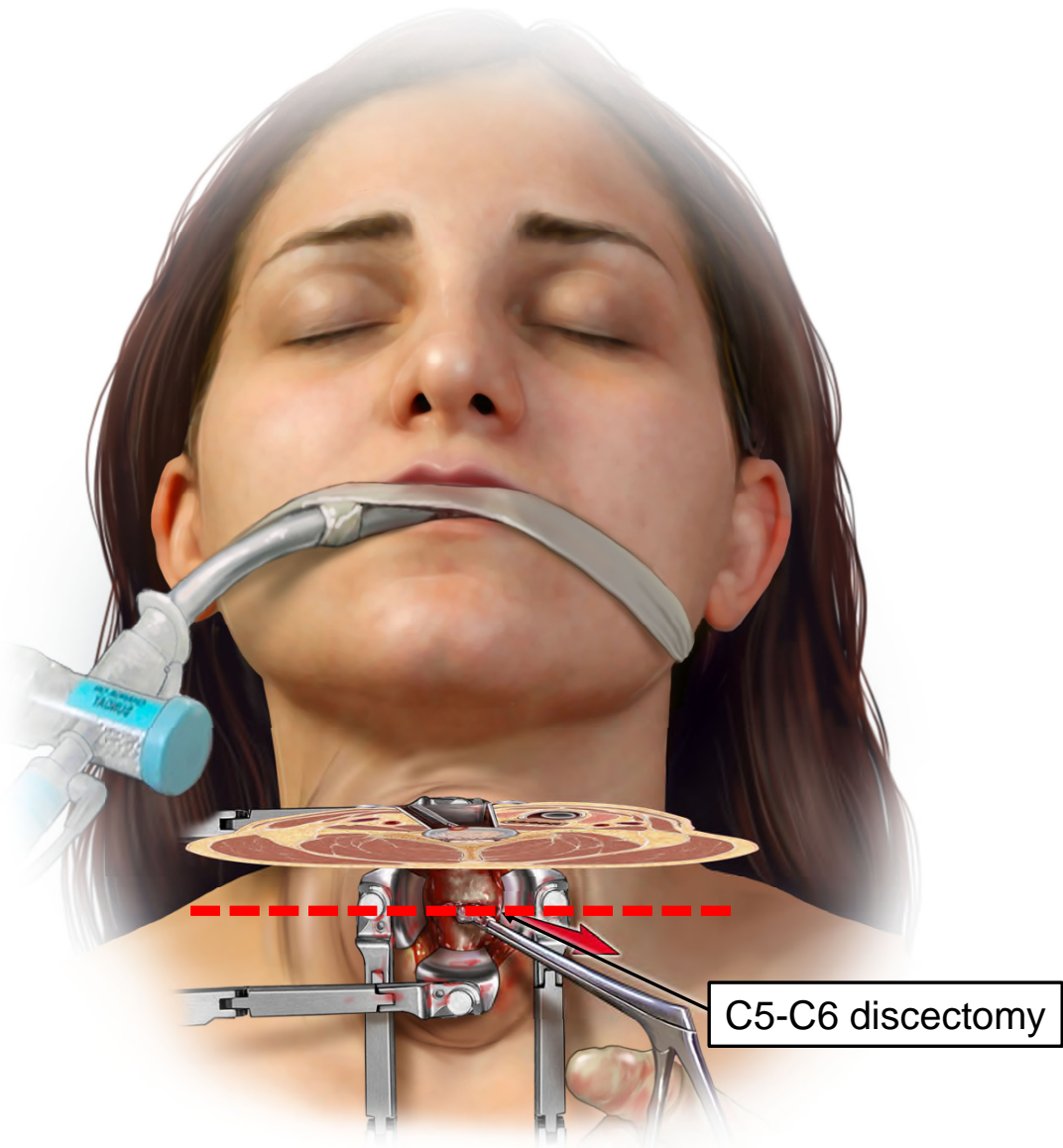


Anterior exposure  
of spine

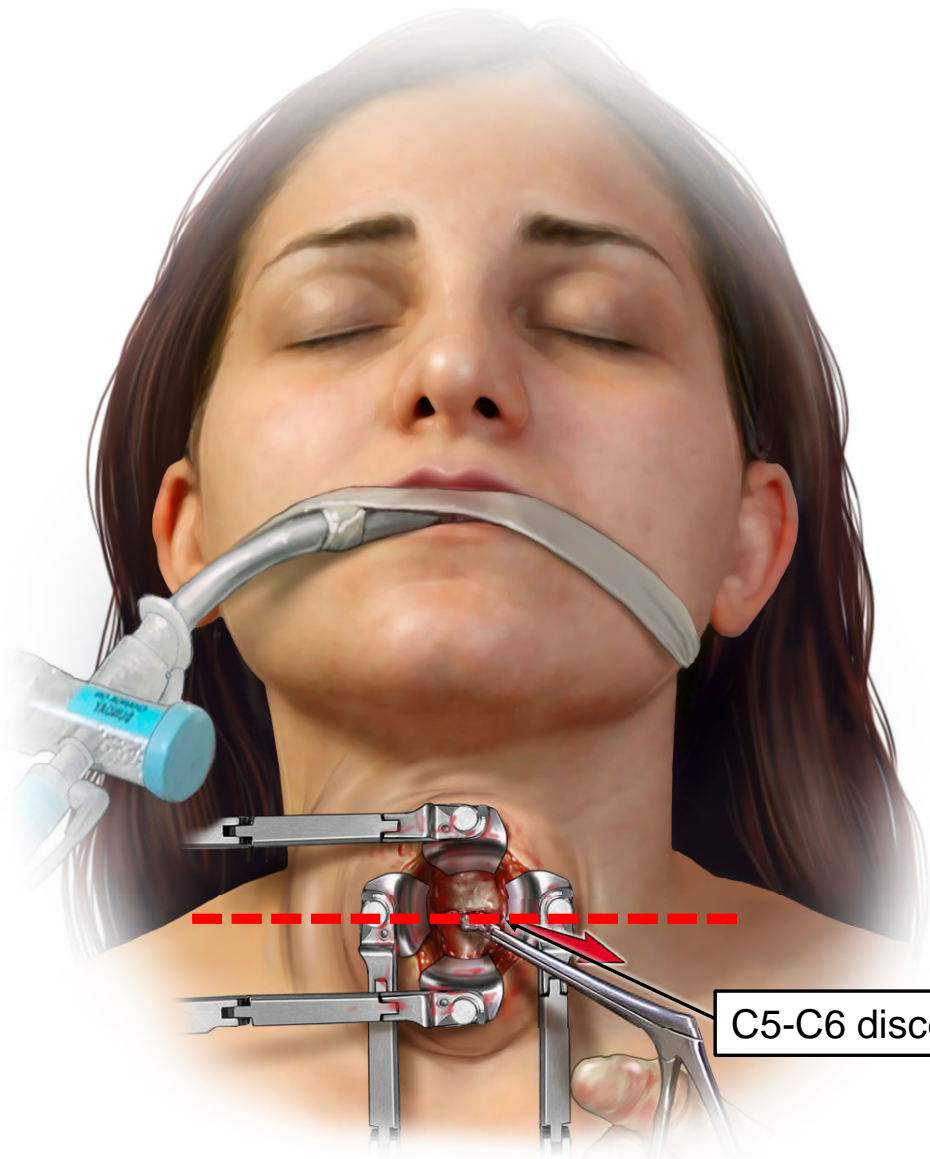




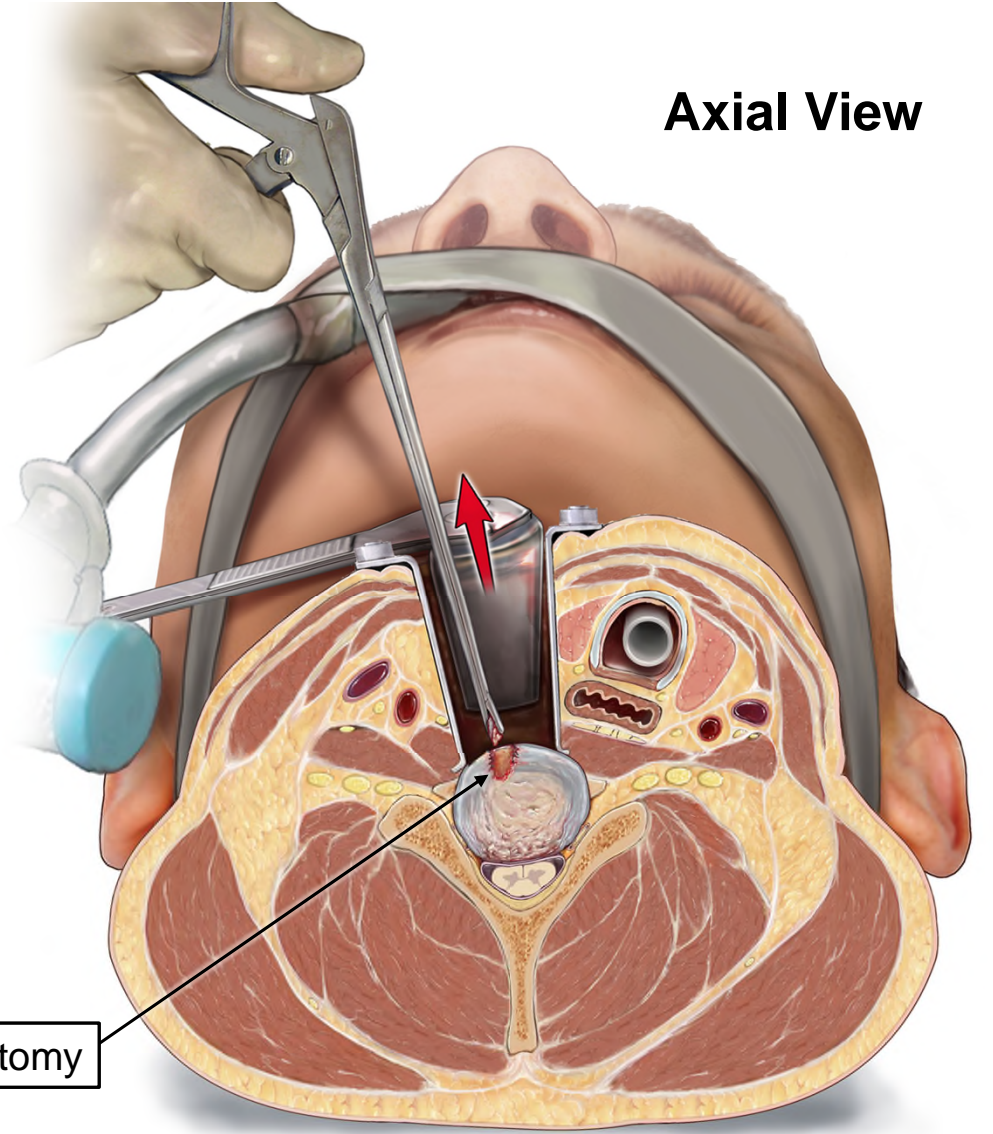
C5-C6 discectomy



C5-C6 discectomy



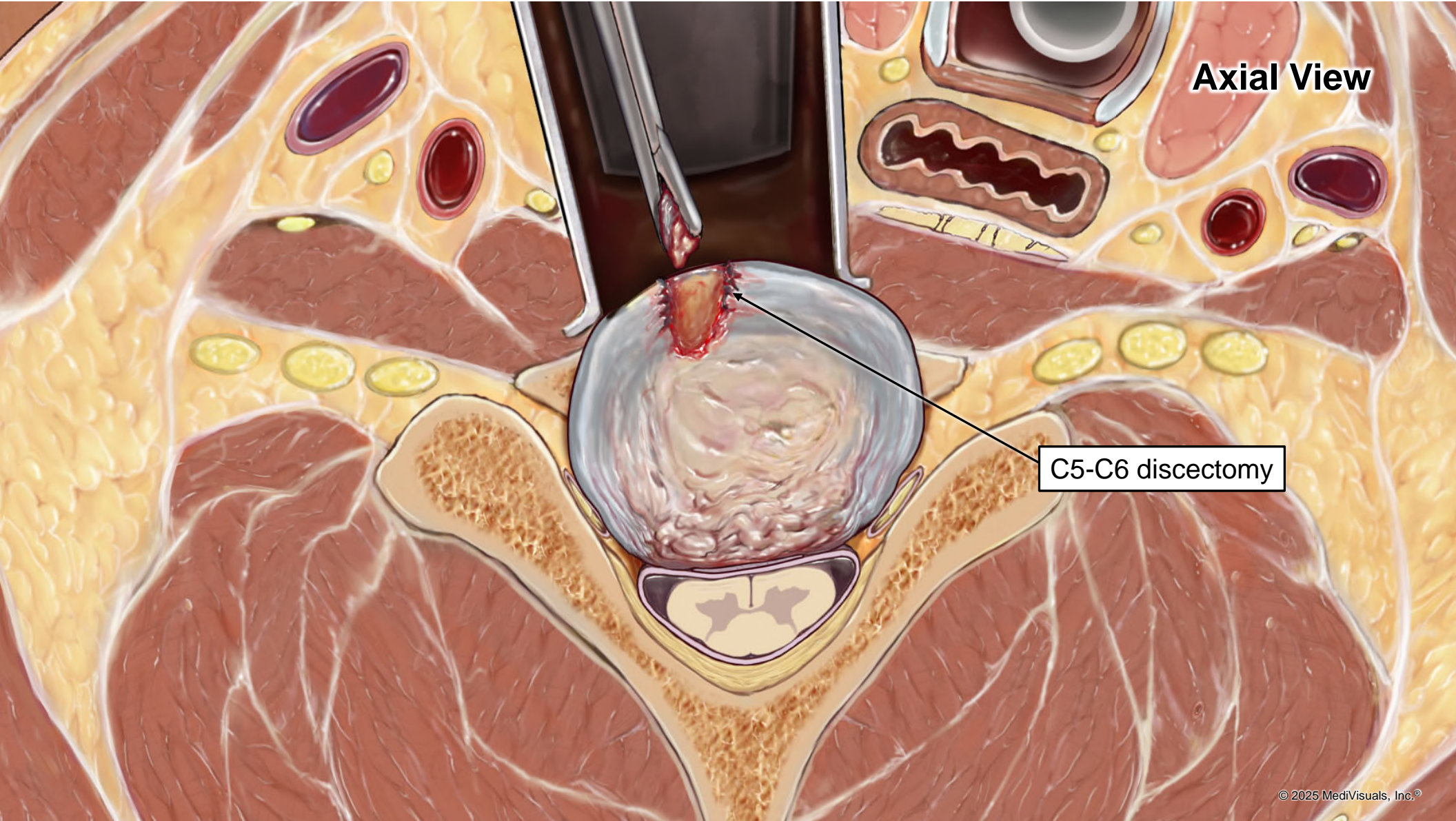
C5-C6 discectomy



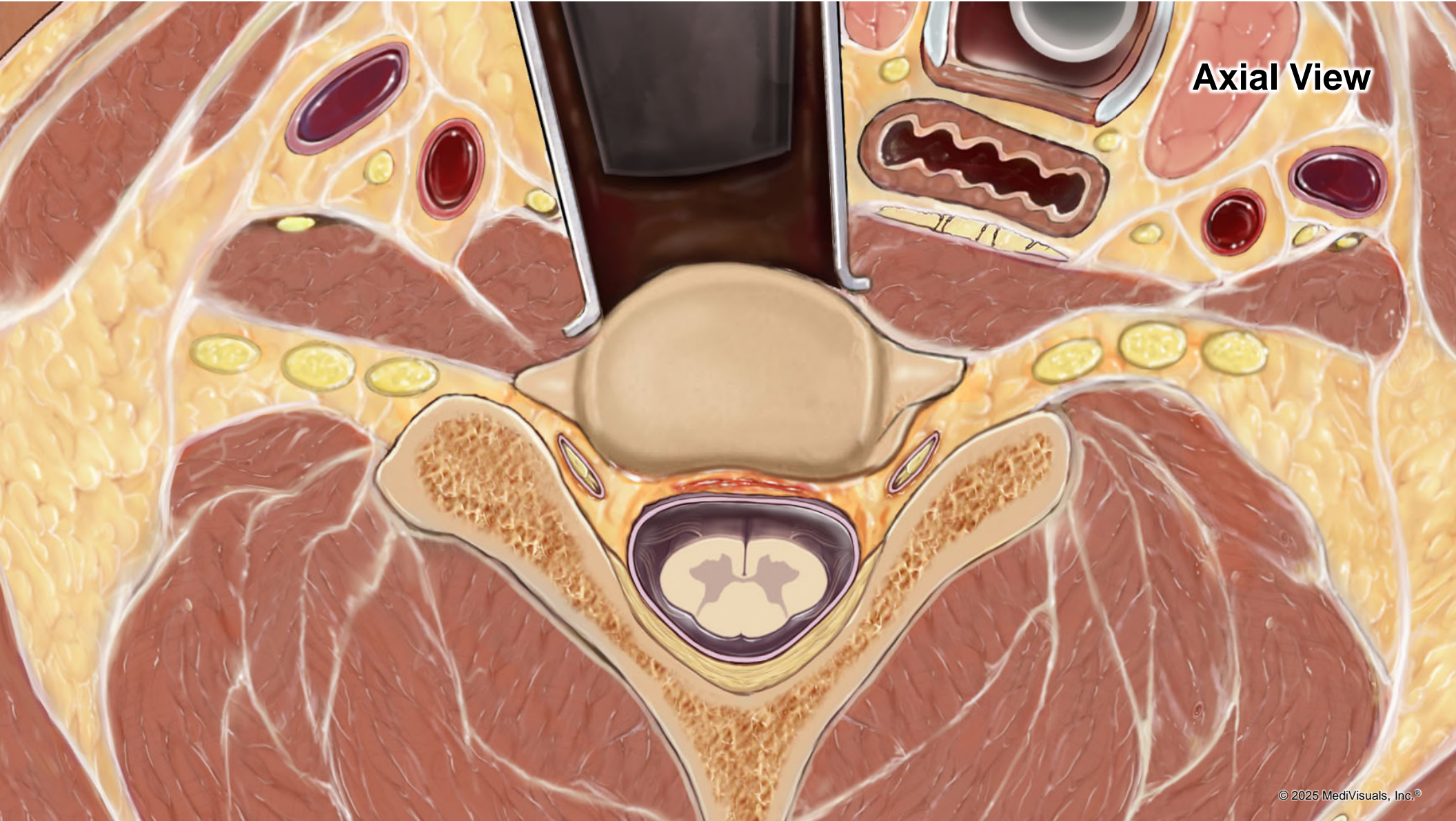
Axial View

**Axial View**

C5-C6 discectomy

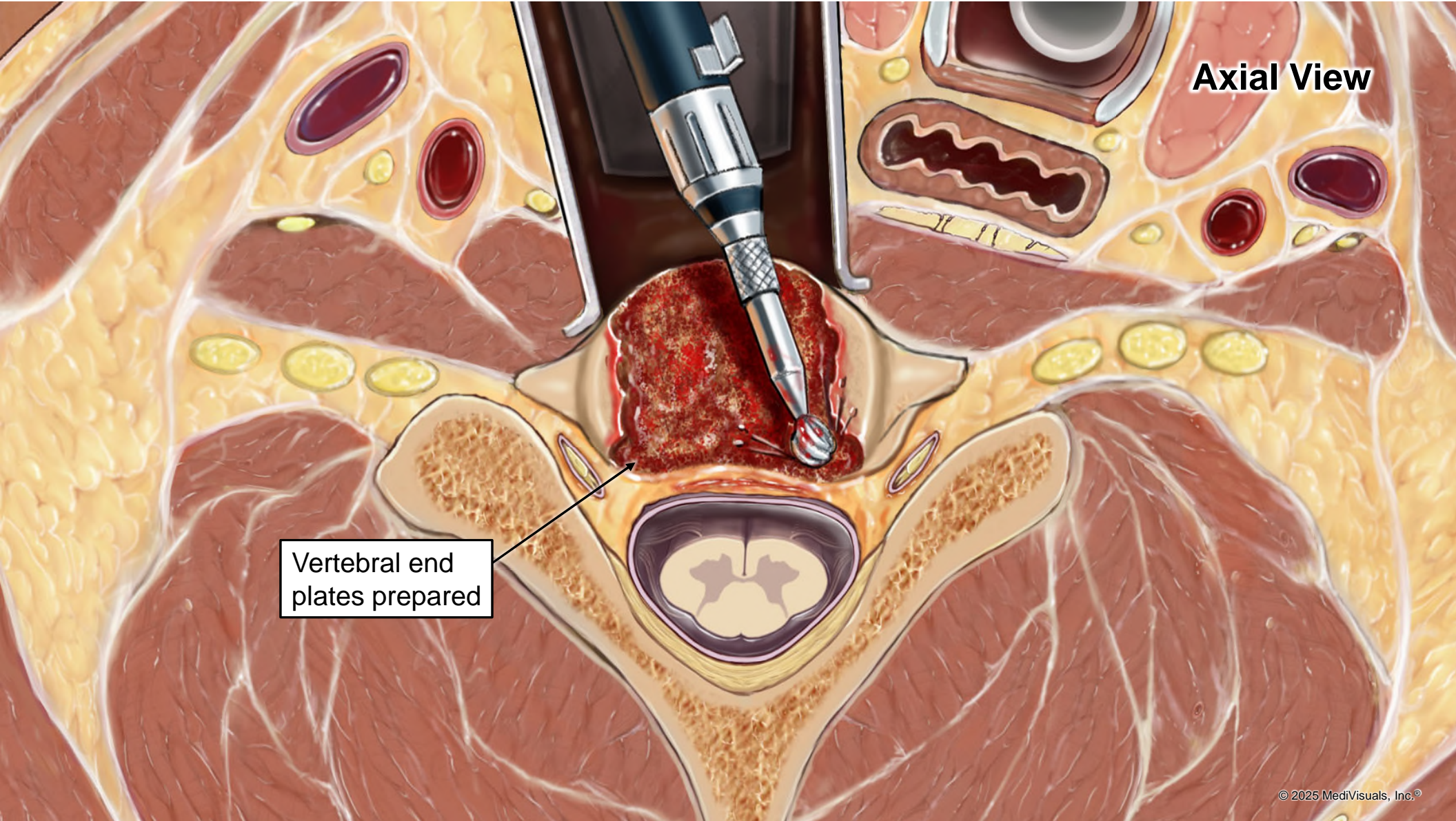


**Axial View**

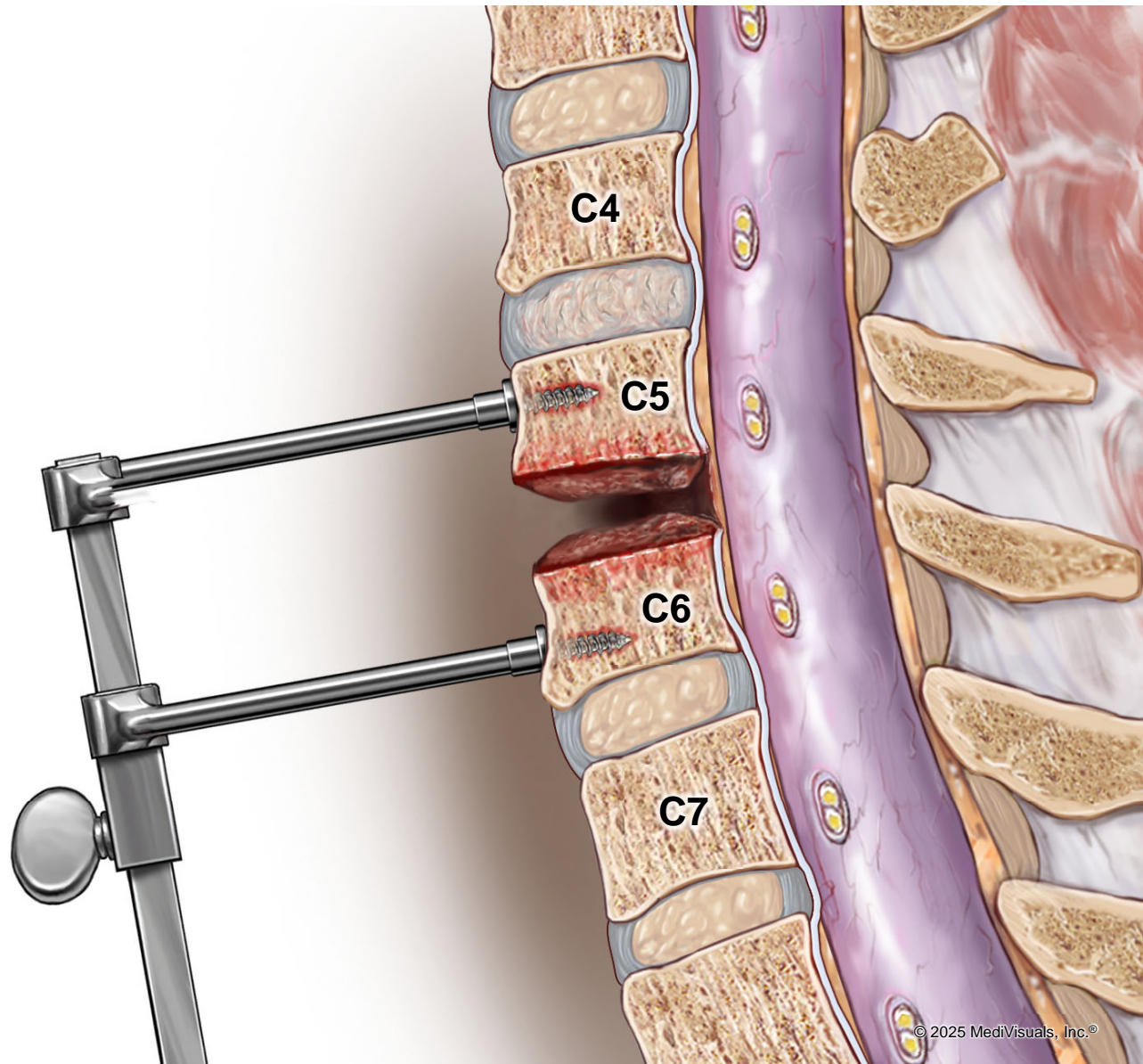


**Axial View**

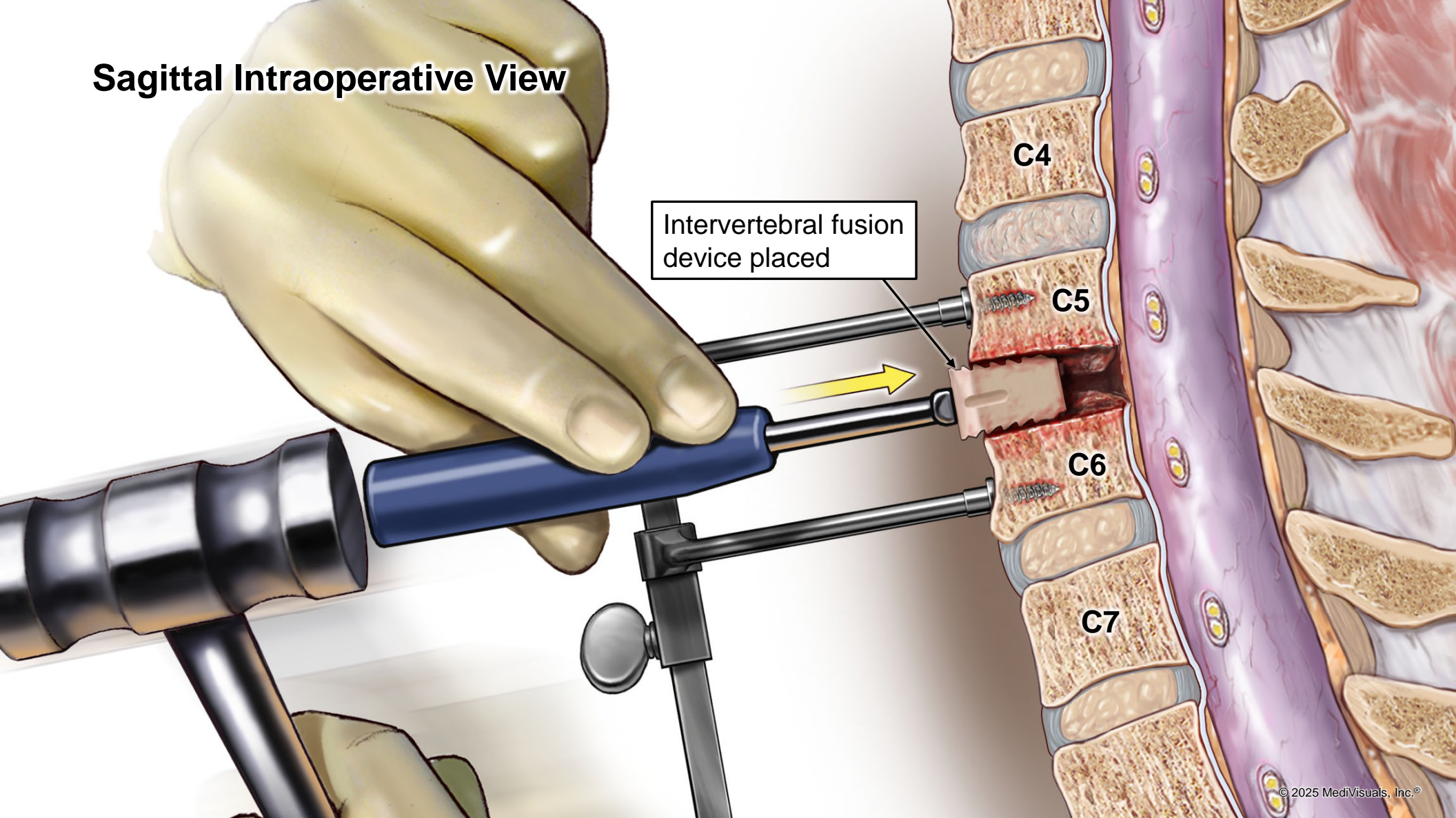
Vertebral end plates prepared



## Sagittal Intraoperative View



# Sagittal Intraoperative View



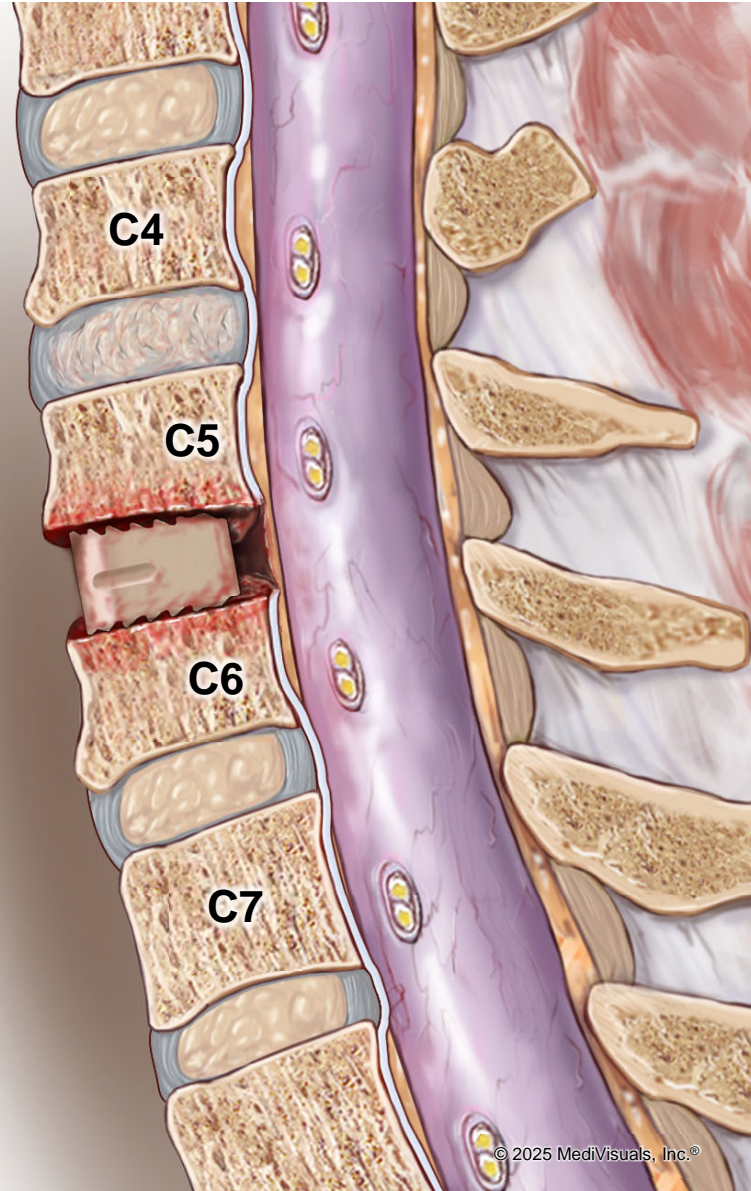
Intervertebral fusion device placed

C4

C5

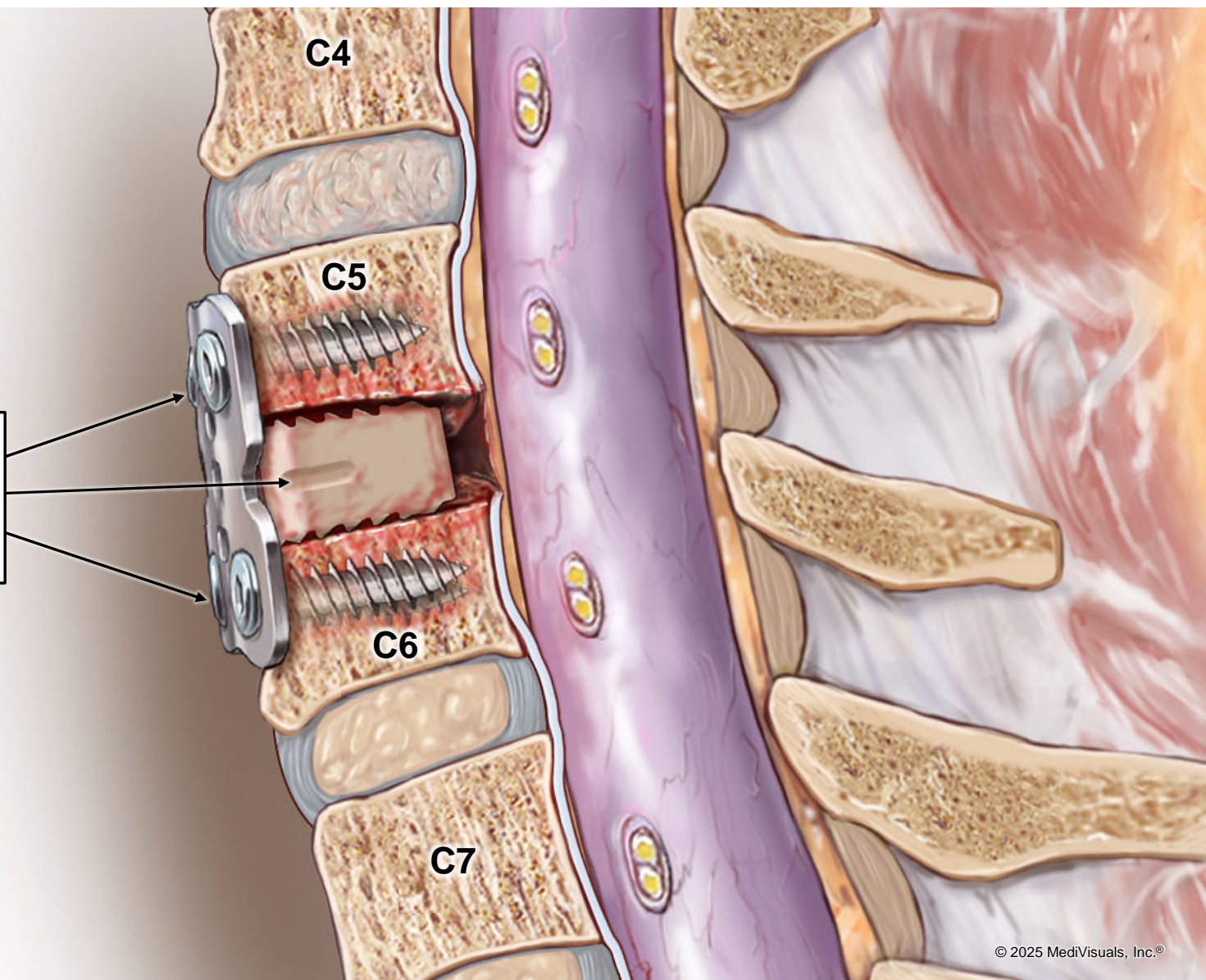
C6

C7



## Postoperative Sagittal View of Spine

Intervertebral fusion device,  
anterior cervical plate, and  
screws in final positions at  
C5-C6



# Injuries We See

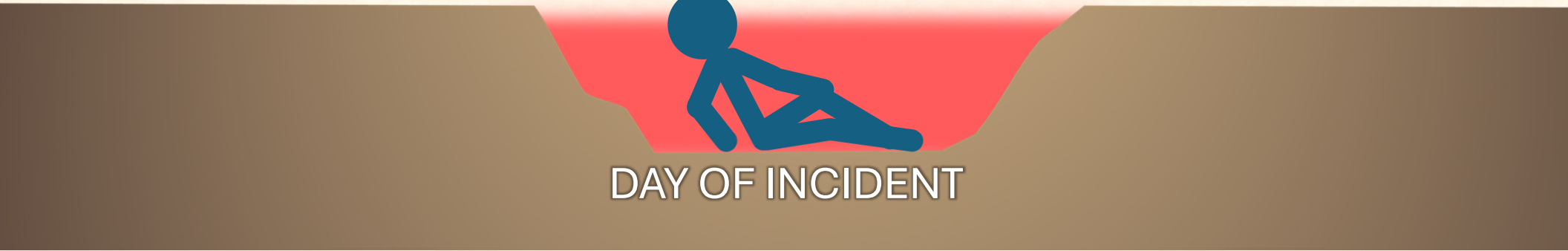
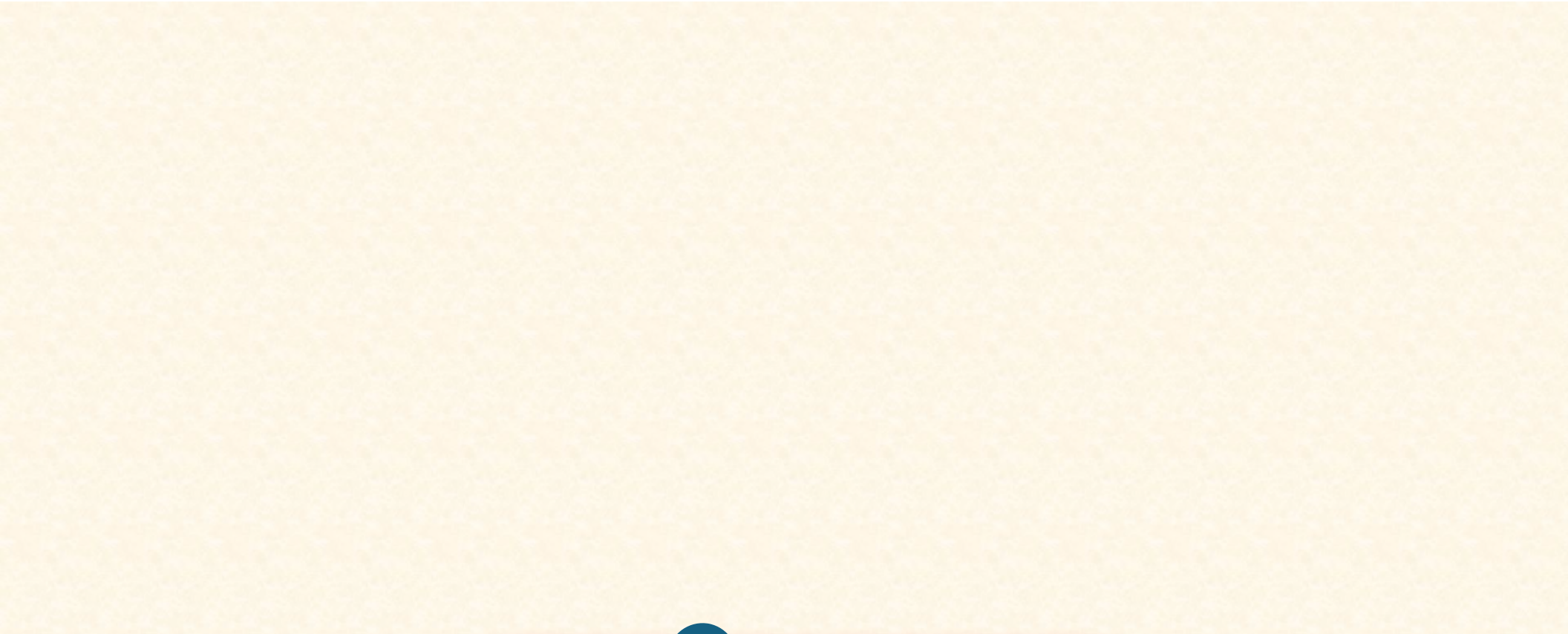




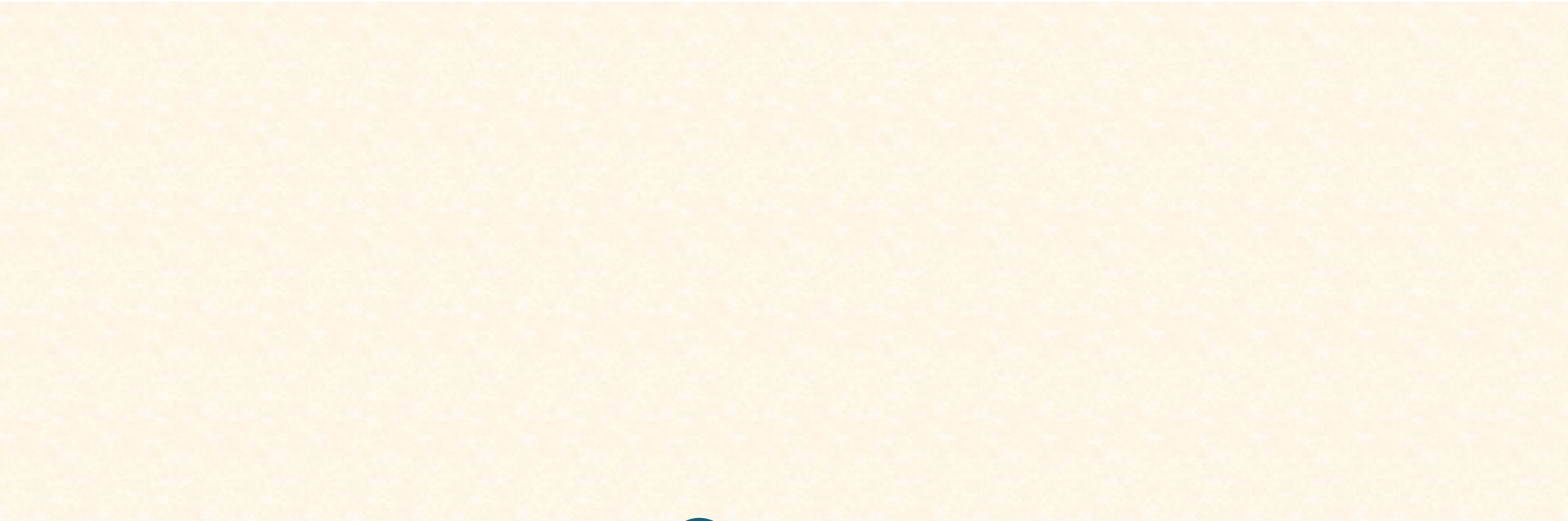
**Injuries We See**

**The Rest of Story  
and the Injuries  
We Don't See**





DAY OF INCIDENT



DAY OF INCIDENT



FIRST 6 MONTHS

DAY OF INCIDENT

FIRST 6 MONTHS



DAY OF INCIDENT



18 MONTHS TREATMENT

FIRST 6 MONTHS

DAY OF INCIDENT

18 MONTHS TREATMENT

FIRST 6 MONTHS



DAY OF INCIDENT



TREATMENT UP TO TRIAL

18 MONTHS TREATMENT

FIRST 6 MONTHS



DAY OF INCIDENT

TREATMENT UP TO TRIAL

18 MONTHS TREATMENT

FIRST 6 MONTHS



DAY OF INCIDENT



NEXT 20 YEARS

TREATMENT UP TO TRIAL

18 MONTHS TREATMENT

FIRST 6 MONTHS





NEXT 20 YEARS

TREATMENT UP TO TRIAL

18 MONTHS TREATMENT

FIRST 6 MONTHS



DAY OF INCIDENT

WHAT WILL BRING MR. \_\_\_\_\_ BACK TO EVEN

NEXT 20 YEARS

TREATMENT UP TO TRIAL

18 MONTHS TREATMENT

FIRST 6 MONTHS



DAY OF INCIDENT

If you have your health,  
you have 100 dreams.



If you have your health,  
you have 100 dreams.



If you lose your health,  
you have 1 dream.



HEALTH HAS VALUE.

GOOD HEALTH IS PRICELESS.

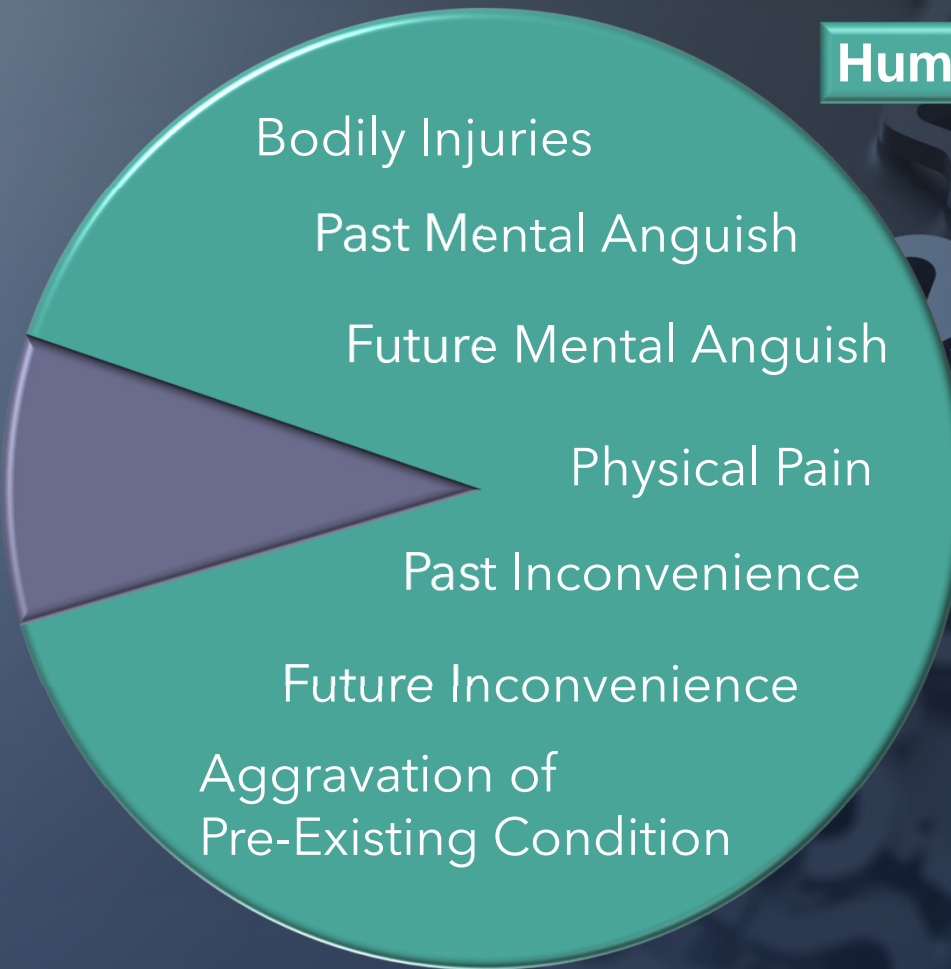
# What was taken from Angela?

Harms and Losses



# Angela's Damages

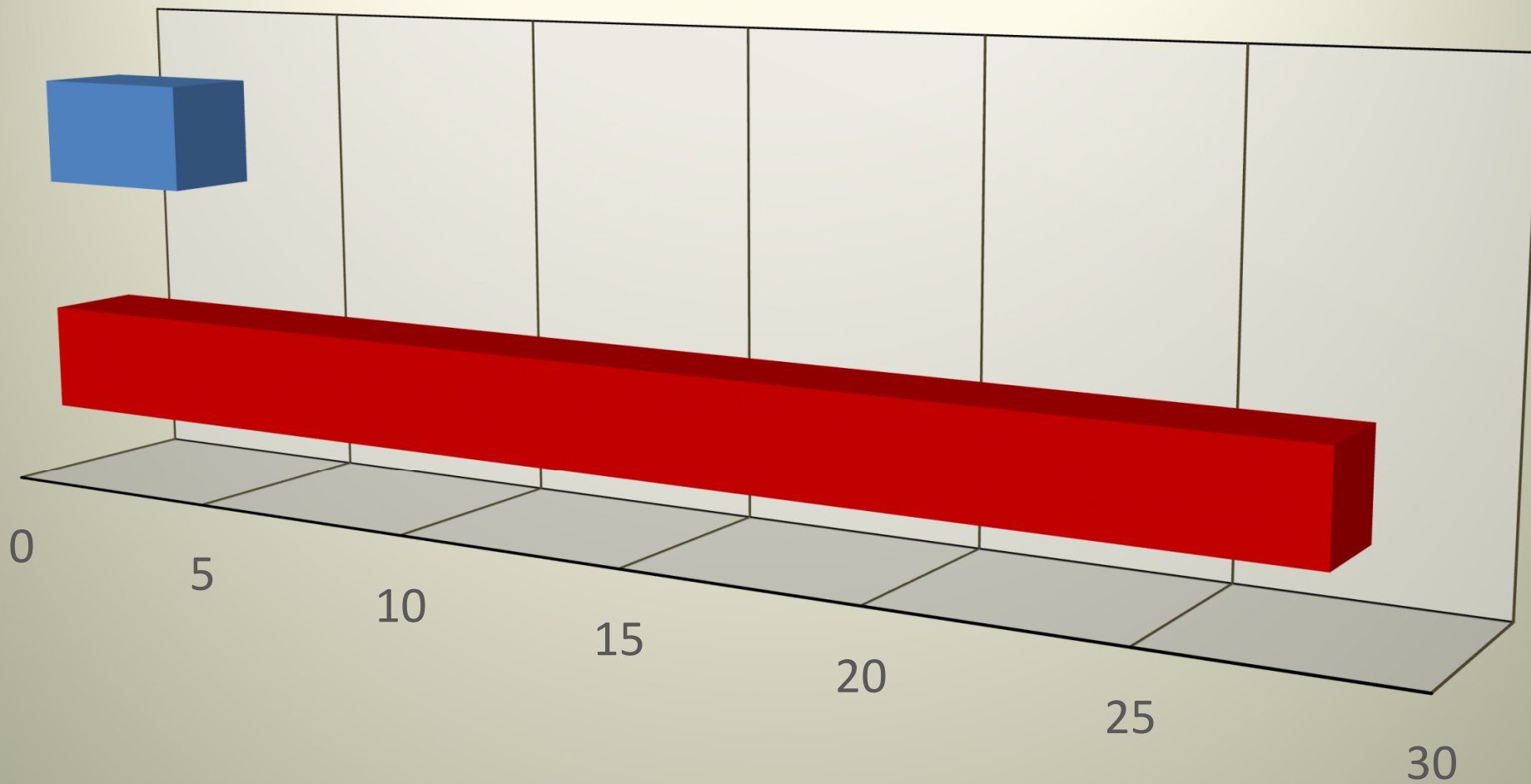
Monetary  
Losses  
\$758,356.00



**Human Losses**

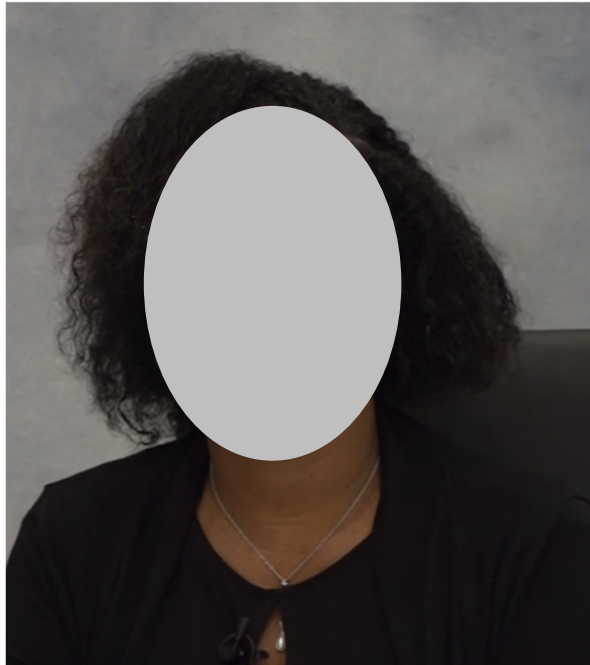
**Years Since Crash: 3.5 Years**

**Life Expectancy: 27.9 Years**





**\$7,800,000.00**



“Q: ...at any point did Yvette return to how she was before December 28th, 2019?”

**A: No, she did not.”**

- \_\_\_\_\_  
Supervisor



"After the car accident, she was, I'll say more, **more scared, more nervous** to go to her clients."

- \_\_\_\_\_  
Supervisor



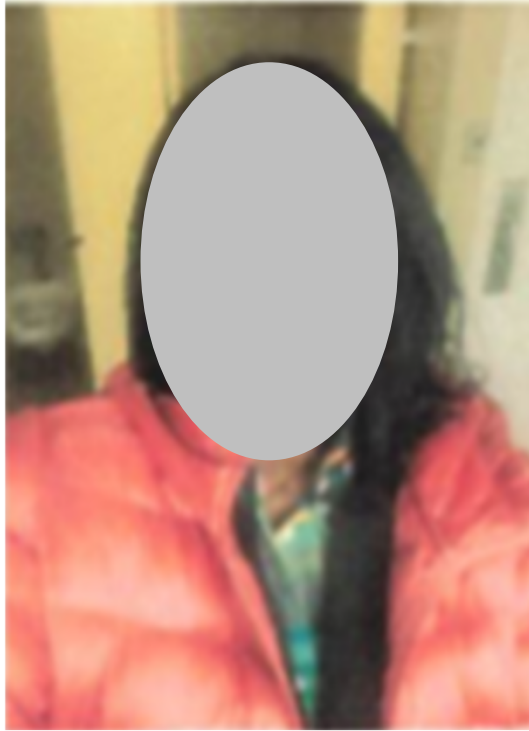
J  
Sister

## Before

Active  
Good as nurse  
running elderly facility  
Health Freak  
No Alcohol  
No Smoking  
Excellent at job  
(2 jobs)  
Driving "Just Go"  
confident nurse

## After

Laceration - Embarrassed  
Swelling about not  
Eye discoloration providing  
Bruising - Fragmented  
Severe Headaches thought  
process  
Photophobia Ability to  
Vertigo speak ↓  
Pressure behind eye  
Double vision  
floaters  
no focus



**S** \_\_\_\_\_  
Sister

S

\_\_\_\_\_

\_\_\_\_\_ Before

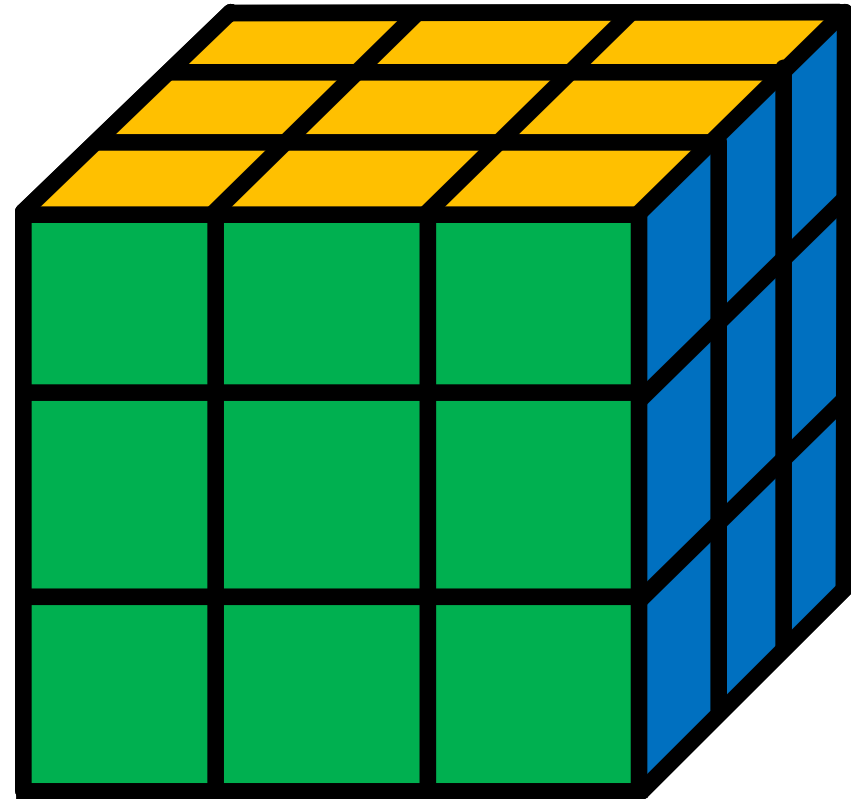
Energetic  
Enjoyed Job  
Active  
No Headaches  
No Vision Problems  
No problems Driving  
No work problems

\_\_\_\_\_ After

Isolated  
not outgoing  
reserved  
headaches/migraines  
problems with eyes  
big embarrassment  
would not drive  
won't drive as  
much

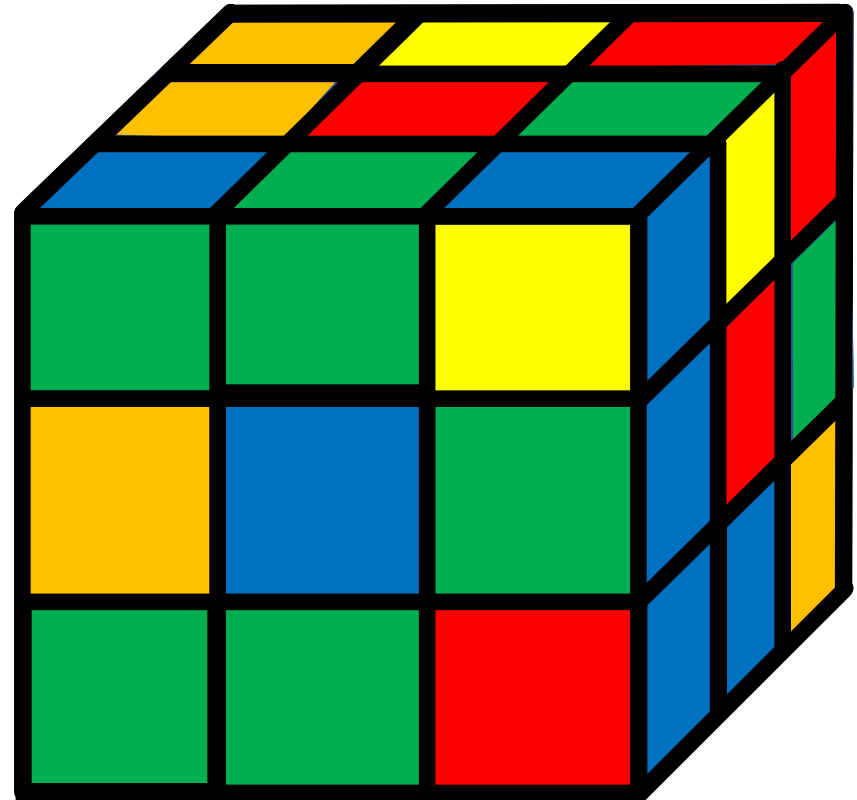


- Creative
- Perfect Health
- No Pain
- Energy
- Trusted
- Workaholic
- Go-To Nurse
- Confident
- Goal = RN



\_\_\_\_\_ **Before**

- Not Healthy
- No Job
- No Confidence
- Headaches
- Vision Problems
- Speech Problems
- Fear
- Not the Same Person
- Poor Decisions



\_\_\_\_\_ **After**

Chapter 2:  
“We want you to  
make her whole.”



**JURY INSTRUCTION NO. 14**

Finding Instruction

You shall award damages to the plaintiff if the plaintiff has proved by the greater weight of the evidence that the defendant's negligence was a proximate cause of the plaintiff's damages.

**JURY INSTRUCTION NO. 16**  
Types of Damages

In determining the damages to which plaintiff \_\_\_\_\_ is entitled, you shall consider any or all of the following which you believe by the greater weight of the evidence was caused by the negligence of the defendant, \_\_\_\_\_, Inc.:

1. any bodily injuries she sustained and their effect on her health according to their degree and probable duration;
2. any physical pain and mental anguish she suffered in the past and any that she may be reasonably expected to suffer in the future;
3. any inconvenience caused in the past and any that probably will be caused in the future;
4. any medical expenses incurred in the past and any that may be reasonably expected to occur in the future;
5. any earnings she lost because she was unable to work at her calling;
6. any loss of earnings and lessening of earning capacity, or either, that she may reasonably be expected to sustain in the future.

Your verdict shall be for such sum as will fully and fairly compensate plaintiff for the damages sustained as a result of the defendant's negligence.

Your verdict may also contain an award of interest. The decision whether or not to include interest is entirely up to you. If you do award interest, you may choose a date from the date of the crash, December 28, 2019, up until the date of the trial upon which to begin the accrual of interest.

JURY INSTRUCTION NO. 16

Types of Damages

In determining the damages to which plaintiff \_\_\_\_\_ is entitled, you shall consider any or all of the following which you believe by the greater weight of the evidence was caused by the negligence of the defendant, \_\_\_\_\_, Inc.:

2. any physical pain and mental anguish she suffered in the past and any that she may reasonably be expected to suffer in the future;
3. any inconvenience caused in the past and any that probably will be caused in the future;
4. any medical expenses incurred in the past and any that may be reasonably expected to occur in the future;
5. any earnings she lost because she was unable to work at her calling;
6. any loss of earnings and lessening of earning capacity, or either, that she may reasonably be expected to sustain in the future.

Your verdict shall be for such sum as will fully and fairly compensate plaintiff for the damages sustained as a result of the defendant's negligence.

Your verdict may also contain an award of interest. The decision whether or not to include interest is entirely up to you. If you do award interest, you may choose a date from the date of the crash, December 28, 2019, up until the date of the trial upon which to begin the accrual of interest.

**JURY INSTRUCTION NO. 16**  
**Types of Damages**

In determining the damages to which plaintiff Yvette Norman is entitled, you shall consider any or all of the following which you believe by the greater weight of the evidence was caused by the negligence of the defendant, Leonard's Express, Inc.:

~~1. any bodily injuries she sustained and their effect on her health according to their degree~~

- 1. any bodily injuries she sustained and their effect on her health according to their degree and probable duration;**
- 2. any physical pain and mental anguish she suffered in the past and any that she may be reasonably expected to suffer in the future;**
- 3. any inconvenience caused in the past and any that probably will be caused in the future;**

Your verdict shall be for such sum as will fully and fairly compensate plaintiff for the damages sustained as a result of the defendant's negligence.

Your verdict may also contain an award of interest. The decision whether or not to include interest is entirely up to you. If you do award interest, you may choose a date from the date of the crash, December 28, 2019, up until the date of the trial upon which to begin the accrual of interest.

**JURY INSTRUCTION NO. 16**  
**Types of Damages**

In determining the damages to which plaintiff Yvette Norman is entitled, you shall consider any or all of the following which you believe by the greater weight of the evidence was caused by the negligence of the defendant, Leonard's Express, Inc.:

1. any bodily injuries she sustained and their effect on her health according to their degree and probable duration;

4. any medical expenses incurred in the past and any that may be reasonably expected to occur in the future;
5. any earnings she lost because she was unable to work at her calling;
6. any loss of earnings and lessening of earning capacity, or either, that she may reasonably be expected to sustain in the future.

the damages sustained as a result of the defendant's negligence.

Your verdict may also contain an award of interest. The decision whether or not to include interest is entirely up to you. If you do award interest, you may choose a date from the date of the crash, December 28, 2019, up until the date of the trial upon which to begin the accrual of interest.

## 's Harms and Losses

### Economic Damages

• Past Medical Expenses:	\$ <u>86,686.60</u>
• Future Medical (Life Care Plan):	\$ <u>1,245,316.30</u>
• Lost Past Wages:	\$ <u>5,705.30</u>
• Lost Future Earnings:	\$ <u>720,000.00</u>

### Non- Economic Damages

• Bodily Injuries and their effect on her health according to their degree and probable duration:	\$ <u>3,000,000.00</u>
• Physical Pain and Mental Anguish	
Past:	\$ <u>225,000.00</u>
Future:	\$ <u>1,897,500.00</u>
• Inconvenience	
Past:	\$ <u>90,000.00</u>
Future:	\$ <u>759,000.00</u>

*Full and Fair Compensation:*

**\$8,029,208.20**

# Your Tools



COMMON

SENSE





to be best in  
point of view.

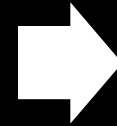
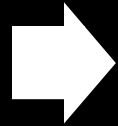
# **Credibility** [ˌkrɪdɪbəlɪti]

quality of being  
believable or tru  
established reli

# **Failure To Accept Responsibility**







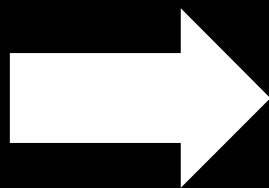
**NO ISSUE WALKING**

**CORPORATION'S  
NEGLIGENCE**

**KNEE REPLACEMENT**



**NO ISSUE WALKING**



**KNEE REPLACEMENT**

# Taking Responsibility

