**UNITED STATES DISTRICT COURT**
**NORTHERN DISTRICT OF FLORIDA**
**PENSACOLA DIVISION**

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|---|---|
| MICHELLE MARIE BLUM,<br><br>Plaintiff,<br><br>v.<br><br>3M COMPANY, 3M OCCUPATIONAL SAFETY LLC, AEARO HOLDING LLC, AEARO INTERMEDIATE LLC, AEARO LLC, and AEARO TECHNOLOGIES LLC,<br><br>Defendants. | Case No. 7:20cv122-MCR-GRJ |

## VERDICT FORM

We, the jury, in the above entitled and numbered case, unanimously find as follows on Plaintiff Michelle Marie Blum's claims and 3M's affirmative defense, based on the Court's instructions on the law and the evidence:

I. Plaintiff's Claims:

(1) Strict Liability—Design Defect

____Proven ___✓_Not Proven

(2) Strict Liability—Failure to Warn and/or Instruct

___Proven ___✓_Not Proven

(3) Negligence

___Proven ___✓_Not Proven

(4) Gross Negligence

___Proven ___✓_Not Proven

(5) Breach of Express Warranty

___Proven ___✓_Not Proven

(6) Breach of Implied Warranty

___Proven ___✓_Not Proven

(7) Negligent Misrepresentation

___Proven ___✓_Not Proven

(8) Fraudulent Misrepresentation

___Proven ___✓_Not Proven

(9) Fraudulent Concealment

___Proven ___√___Not Proven

(10) Consumer Fraud

___Proven ___√___Not Proven

*If you have found any claim proven—claims (1), (2), (3), (4), (5), (6), (7) or (10) by a preponderance of the evidence and/or claims (8) and (9) by clear and convincing evidence—continue to decide 3M's affirmative defense in Section II.*

*If you have not found any claim above proven, your work is complete, and you should have the Foreperson sign and date the Verdict Form.*

II. 3M's Affirmative Defense:

Statute of Limitations

Do you find by a preponderance of the evidence that Ms. Blum relied on subsequent and specific actions of deception, fraud, or misrepresentation by 3M that kept her from timely bringing suit and that she lacked knowledge of the true facts before June 20, 2016?

___ Yes ____No

*If you answered "No" to this question, your work is complete and your verdict will be in favor of 3M on all claims. You should have the Foreperson sign and date the Verdict Form.*

*If you answered "Yes," continue to Section III.*

III. Compensatory Damages:

If you have found in favor of Ms. Blum on any of her claims, state the total damages, if any, you find for:

Past and future noneconomic damages
(pain and suffering, mental and physical) $ _____

*Continue to Section IV.*

IV. Punitive Damages:

*(You may but are not required to complete this Section if you awarded damages in Section III).*

Do you find, for all claims other than fraudulent misrepresentation and fraudulent concealment, that Ms. Blum has proven punitive damages by a preponderance of the evidence?

___Yes ____No

Do you find that Ms. Blum has proven punitive damages by clear and convincing evidence based on her claims of fraudulent misrepresentation and/or fraudulent concealment?

___Yes ____No

*If you answered "Yes" to either question, please state the amount.*

$ _____

*Your deliberations are now complete, and the Foreperson should sign and date this Verdict Form.*

SO SAY WE ALL, this 29th day of October, 2021.

[redacted]

Foreperson's Signature