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- § 3:3 While staying at her time share resort managed and owned by defendant, plaintiff suffered a subarachnoid hemorrhage caused by a ruptured aneurysm while alone in her unit; husband called multiple times, became frantic, and called the front desk asking they do a safety check; employees of defendant did go to the room, knocked, and entered, but did not canvas the entire room to observe plaintiff lying on the floor in the back bedroom; violation of resort's own policies; as a result of a delay in discovery, plaintiff developed hydrocephalus, causing severe brain injury; negligence, loss of consortium by husband; negligent undertaking alleged, aka an application of the "Good Samaritan Rule" that attaches liability for performing services resulting in harm; special verdict form
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- § 3:5 Food delivery service driver accepts a delivery order for three large teas from major coffee company and goes through the drive-through; upon placing his order, he proceeded through the drive-through window; plaintiff observed that all three cups were placed in the same tray and the tray was handed to him by an employee. Upon turning his body to place the tray on the front seat, two hot teas fell out of the tray and spilled into his lap and groin areas sustaining significant injury to plaintiff's genitals; the alleged negligence was failure of the coffee company's employee to secure the tea

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- § 4:2 During a upper endoscopy/esophagogastroduodenoscopy (EGD) and colonoscopy procedure, plaintiff required intubation by defendant Certified Registered Nurse Anesthetist (CRNA) and an ambulance was summoned; defendant paramedics transported plaintiff to a hospital where the doctor who performed the EGD and colonoscopy procedure had privileges, instead of a closer hospital; in route, the paramedics also did not hear left lung sounds during transport, so they extubated and reintubated Merlo to readjust the endotracheal tube; plaintiff suffered brain anoxia as a result and is in a permanent vegetative state; paramedic malpractice; CRNA malpractice; physician malpractice; loss of consortium; gross negligence; failure to obtain informed consent; apportionment of responsibility; legal relationship not disputed; economic and noneconomic damages sought
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- § 4:4 Plaintiff, a skilled college athlete preparing to become an NFL punter suffered injuries during a collegiate football game; after a hard tackle, he felt drunk; he continued to have symptoms; plaintiff sought treatment with defendant, who represented that he was a specialist in Chiropractic Neurology; plaintiff did not improve and his condition worsened; he sought treatment from another chiropractor resulting in additional injuries; a board-certified brain injury specialist diagnosed a significant brain stem injury, which resulted in Cervical Medullary Syndrome. Cervical Medullary Syndrome is a clinical condition that occurs as a result of inflammation, deformity, or compression of the lower part of the brain (i.e., the brain stem); plaintiff alleged that he now suffers from elevated pain/spasms in his neck and back; chronic migraines, tinnitus, double vision, TMJ, elevated blood pressure, extremity numbness, swallowing difficulties, light sensitivity, incontinence, and imbalance issues; bifurcated trial on issue of the statute of limitations from liability/damages; medical negligence; non-party tortfeasors with apportionment of liability; duty of care as a chiropractic doctor; incorrect instruction regarding burdens of the party to reduce damages to present cash value

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- § 5:1 Cross complainant, an electrician was called to defendants' premises because of flickering lights; while checking the main panel, an explosion occurred with an arch electrical flash; plaintiff suffered third and second degree burns and his wife sued for loss of consortium; negligence per se alleged with special instructions related to building codes and regulations; multiple layers of ownership and control of premises issues; cross-complaints; negligence and premises liability alleged; removal of claims and parties; special verdict forms
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manager company; plaintiff's shoes became wet at the start of the stairs which were previously not epoxied correctly, slips and falls down a flight of stairs, hitting her head; treatment sought the following day; traumatic brain injury, severe headaches, declined cognitive impairment in the form of memory loss, lack of ability to engage in executive functions such as multi-tasking, dizziness, nausea, depression; negligence; comparative negligence; vicarious responsibility; apportionment of fault; custom and practice; failure to warn; construction defect; special verdict form

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§ 5:4 Site representative/supervisor of defendant owner of well-known home used to host large events, photo shots and movies, falls off an unguarded, cantilevered platform that jutted out over a hillside suffering multiple injuries; unguarded platform and poor security for the large crowd on tour were contended to be dangerous, despite plaintiff's over 250 times on the platform at previous events; premises liability; comparative fault of plaintiff and others; economic and noneconomic damages; negligence; negligence per se due to code violations

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§ 6:1 Father of four suffers fatal blast injuries in front of his three daughters and wife; starting a popular watercraft resulted in an explosion; watercraft had repairs under warranty from manufacturer and retailer; partial disassembly of engine done during repairs; manufacturing defect, strict liability,

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§ 6:2 Popular electric car manufacturer is sued for an accident allegedly caused by defective autopilot features (software) and defective airbag systems; plaintiff was using the autopilot features when her car did not recognize a median strip and the car crashed into, causing air bags to deploy; plaintiff sustained a broken jaw in three places, loss of multiple teeth, hand and arm injuries; plaintiff contended either the airbags should not have been deployed at all because of the defective software, but deployed, did not "plume" but sling shot out; products liability based upon design defect with consumer expectation test that the automobile was safer with these features; intentional misrepresentation, concealment; reliance; comparative negligence of plaintiff; defense verdict

§ 6:3 Bellwether case regarding toxic chemical TCP found in city's wells affecting its water supply; harm defined; vicarious responsibility; strict liability for defective design or insufficient warning of potential safety hazards; risk benefit test; negligent designing, manufacturing, supplying, or selling product; damages for city's costs for: installing treatment for TCP in ten wells; operating, maintaining, repairing and/or modifying facilities to treat TCP in the wells; acquiring additional land for treatment facilities to treat TCP in wells; loss of use of the wells due to TCP contamination; punitive damages against employer for conduct of employee—trial not bifurcated

§ 6:4 Plaintiff sued a manufacturer of a herbicide that he used on a monthly basis for 20 years for his exposure and resulting terminal illness, mycosis fungoides, a blood disorder that caused changes to his skin; plaintiff sued on four theories: negligence, negligent failure to warn, design defect, and strict liability/failure to warn plus sought punitive damages; plaintiff alleged that defendants knew that the herbicide was not safe for humans and failed to warn of its dangers; split decision by jury on theories of liability; special verdict form

§ 6:5 Plaintiff was life-long research scientist and professor of biological sciences who worked at labs throughout the

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United States; his research involved labs with asbestos containing lab equipment; the specific equipment was gloves/mittens manufactured by the defendant laboratory; injuries were a diagnosis of peritoneal mesothelioma caused by exposure to asbestos; multiple tortfeasors (13) non-parties in the case but alleged to have contributed to plaintiff's injuries; comparative negligence of plaintiff and others; negligence, strict liability, failure to refit/retrofit; loss of consortium

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CHAPTER 7. INTENTIONAL TORTS

- § 7:1 Plaintiff truck driver for defendant, a large retail store, is rear-ended while driving for them; plaintiff is injured and placed on medical leave with restrictions regarding driving, bending, and lifting; plaintiff goes on two preplanned vacations; third party administrator observed plaintiff sub rosa driving, stooping, and lifting; report sent to defendant and investigation ensued; investigation was flawed; plaintiff was advised that he had engaged in an integrity violation of company policy, which was cause for immediate termination; this was allegedly repeated throughout the company; plaintiff developed a major depressive disorder; defamation with a labor/employment cross-over component; defamation per quod; publication and liability for foreseeable republication special instruction; affirmative defense because statement(s) were true; common law privilege re malice; bifurcated liability, damages, and punitive damages
- § 7:2 Handyman of commercial tenant is assaulted and battered by handymen used by property management company's owner because of the improper filling up of a dumpster on the premises; negligence alleged on basis of the assault and battery incited by the property manager; traumatic brain injury; tonic pupil; vicarious responsibility; property owner dismissed; property management company's owner dismissed individually; perpetrators of assault and battery dismissed; comparative negligence admitted by plaintiff; only noneconomic damages claimed; special verdict form
- § 7:3 Contractor's bulldozer struck a utility's gas pipeline and the explosion killed the driver and seriously injured two nearby; utility company sought to enjoin the contractor from excavating in the county; utility company allegedly wrote news articles and letters citing the contractor's negligence; responsibility for the death and injury; contractor cross-complained for

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- § 7:4 Production assistant sought damages from three Los Angeles based film companies and their president/CEO for battery and sexual battery that not only caused her emotional harm, but created a hostile and abusive work environment resulting in a constructive termination; unconsented to and offensive touching; sexually offensive contact; unwarranted harassing conduct based on gender; hostile, intimidating, offensive, abusive work environment; supervisor harassing conduct; pervasive and severe harassment; reasonable woman standard; past and future noneconomic losses; past lost earnings; future lost earnings and medical expenses; emotional distress; susceptible plaintiff; aggravation of prior existing conditions; punitive damages

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- § 8:1 Textile companies cross sue one another for breach of contract based upon the sale and receipt of fabrics among themselves; causes of action for breach of contract, account stated, request for reasonable value of good received; common counts for goods received; open book account; defenses of laches, statute of limitations, breach of the implied warranty of merchantability; defense of no valid third party beneficiary relationship; interest on damages requested
- § 8:2 A bakery and a cookie company formed an alleged joint venture that would involve the bakery bringing in clients to cookie company's factory to increase their provision of healthy bars to brand name companies until their business arrangement crumbled; breach of joint venture agreement, breach of fiduciary duty; fraud; services rendered (quantum meruit)
- § 8:3 Heirs of a founder of a fresh juice company in 1935 bearing his name and likeness sue two major soda manufacturers for using his name and likeness without their consent to sell their products in present day; an intellectual property trust had been established and registered prior to the sale of the juice company business to defendants; soda company defendants used founder's name and story to market

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- its products when it purchased two business run by founder's heirs; in-depth look at California Civil Code §§ 3344 and 3341; deceased personality qualifications; intellectual property rights; multiple special instructions; First Amendment freedom of speech as affirmative defense; claims of Misappropriation of Right of Publicity (California Civil Code section 3344.1) and declaratory and injunctive relief
- § 8:4 Chemical company sues former senior salesman and his new company for 1. Breach of Written Contract; 2. Breach of Fiduciary Duties and Obligations; 3. Interference With Contractual Relations; 4. Interference With Prospective Economic Advantage; 5. Fraud and Deceit; 6. Conversion; 7. Misappropriation of Trade Secrets; 8. Breach of Undivided Loyalty; and 9. Unfair Competition for Violation of Business and Professions Code Section 17200 Et Seq. when defendant salesman resigns, moves to another chemical company and allegedly used trade secrets to lure away his former company's customers; lost profits damages based on multiple legal theories; defendant files a cross-complaint for unpaid wages, interest, and waiting time penalties; special verdict form with 64 questions plus multiple subparts for case in chief; multiple special instructions
- § 8:5 Plaintiff, a marijuana "grow" expert, alleges that he entered into an oral partnership agreement with defendant and defendant's business entity, a then defunct marijuana collective and that defendant breached the terms of the oral contract; stipulated damages; dissolution of partnership; breach of fiduciary duty; joint venture agreement; advisory verdict; breach of implied covenant of good faith and fair dealing; special verdict form; template verdict form exemplar

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- § 9:1 Elderly tenant plaintiff of 19 years accuses defendant apartment manager of Negligence, Breach of the Warranty of Habitability - Tort, Breach of the Covenant of Quiet Enjoyment, Intentional Infliction of Emotional Distress, and Violation of California Civil Code 1942.4; plaintiff alleges that manager retaliated against her after she called the city to report code violations by demolishing a patio/common area used by plaintiff; plaintiff alleges harassing letters left for her by defendant; plaintiff suffers from an incurable

disease and is in a protected class; defendant's actions made her physical and mental conditions worsen; rent reimbursement sought; out-of-pocket damages sought; special instructions given regarding the warranty of habitability and harassment; special verdict form with unique "Summary Section"

- § 9:2 Plaintiff was tenant in defendants' building living with her boyfriend; the unit they were living in was alleged to have no heat and no carbon monoxide detector devices; after using an outdoor grill, the boyfriend moved it into the apartment; without any detectors, plaintiff and her partner were exposed to carbon monoxide; plaintiff became unconscious, fell to the floor and regained consciousness the next morning laying next to her deceased boyfriend; plaintiff claims that landlord breached their covenant of habitability by failing to have heat and carbon monoxide detectors; negligence per se; comparative fault of plaintiff and others
- § 9:3 Commercial landlord allegedly violates lease; tenant charged for common area maintenance costs; landlord fails to provide parking spaces; tenant served with 3-day notice to vacate; definition of "defendants"; definitions of lease, sublease, tenant, landlord (Civ. Code, § 1995.020); breach of covenant of quiet enjoyment; duty to disclose material facts; breach of contract; how to interpret contracts; breach of covenant of good faith and fair dealing; statute of limitations defense; intentional misrepresentation; concealment; reliance; breach of contract damages; "out-of-pocket" and "benefit of the bargain" damages for misrepresentations and concealment; punitive damages
- § 9:4 Family of four (husband/wife/two minor children) claim a roof leak caused dangerous mold to grow in their rental property; insect infestation; lack of hot water; constructive/actual eviction; landlord/tenant; habitability; lease-residential requirements; trespass/nuisance; premises liability; negligent repair/maintenance/ breach of implied warranty of habitability, breach of implied covenant of quiet enjoyment; damages for respiratory issues; running nose; itchy eyes; headaches; skin infections; severe stress and anxiety; relocation costs; special verdict form

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- § 10:1 Investigative assistant for county public defender's

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- § 10:2 Plaintiff, aged 75, worked for defendant pharmaceutical company for 17 years; her work changed from sitting to standing for long periods; despite a doctor's note, her manager refused her medical treatment, claimed she was not injured, and falsely claimed that she tendered her resignation; plaintiff sued on five theories: failure to reasonably accommodate, failure to engage in the interactive process, disability discrimination, age discrimination, and failure to take all reasonable steps necessary to prevent discrimination; numerous special instructions given; bifurcation of punitive damages from liability
- § 10:3 Social worker at a county's Department of Public Social Services, after complaining about racial segregation in the workplace and making FEHA and Whistleblower complaints, is suspended, transferred to another facility, not given computer clearance to complete her work and subjected to intolerable retaliation; constructive discharge; special instructions; wrongly denied Family Medical Leave; unusually susceptible plaintiff; affirmative defense(s) based on same decision doctrine; jury instruction contained exhibit numbers for evidence admitted for a limited purpose; reduction to present value chart instructions
- § 10:4 Two employees of a large utility company accused parent company and subsidiary corporation of fostering a hostile work environment, sexual harassment, harassment in the form of threats, assault and battery, intimation, actual wrongful discharge, constructive discharge and retaliation after reporting upper management supervisors of failing to

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- § 10:5 Director of admissions at a skilled nursing facility complains about the quality of nursing at the facility; advises executive director that she and her family members may sue over poor treatment of her father at the facility; advises that she could no longer do her job of recruiting families to place their loved one in the facilities; plaintiff is terminated, but before her separation, alleged defamatory statement are made about her work ethic and accusations of her violating HIPPA and removing files; wrongful termination as a Whistleblower; affirmative defenses based on same decision; defamation; failure to pay wages and provide rest/meal breaks; interest requested; punitive damages; special verdict form

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- § 11:1 Principals of a solar panel company fraudulently pretend to manufacture and lease mobile solar generators using money invested by plaintiffs; defendants allegedly represented to 11 plaintiffs (banks, investment companies, insurance companies, paint company) that they were investing in 13,900 solar generators worth over \$2 billion when 9700 did not exist; defendant remaining in this lawsuit made those false representations in a conspiracy to aid and abet the solar company; conspiracy, prejudgment interest, punitive damages, fraud and deceit; hybrid special general verdict form
- § 11:2 Plaintiffs own an autobody repair shop and commercial property; defendants bought an adjacent property; demolished the structure in order to build luxury apartments; plaintiffs alleged that the demolition damaged their property; workers and crane activities significantly interfered with their business operations; defendant’s workers trespassed; contractor negligence, emotional distress, negligence,

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- nuisance, false promises, trespass, punitive damages alleged; defendants asserted a non-party was at fault; vicarious liability; bifurcated liability and damages from punitive damages
- § 11:3 Plaintiff was the assignee of a bad faith claim; she was injured in a car accident which, was the fault of defendant's insured; two policy limit demands were made and ignored by defendant; stipulated damages; single claim for the breach of the covenant of good faith and fair dealing; plaintiff alleged that defendant failed to conduct a reasonable investigation into her claims; special jury instruction; modified special verdict
- § 11:4 Plaintiff, an elder resident of defendant's skilled nursing facility and memory care, was evacuated and taken to another facility due to wildfires; while at that facility, plaintiff was unsupervised and suffered two falls resulting in a broken arm; deprived of pain medication and her hearing aids; transported to a hospital leaving whereabouts unknown to family members; negligence; physical elder abuse; elder abuse abduction; negligence per se for violations of many state statutes, ordinances, and regulations relating to skilled nursing facilities; unusually susceptible plaintiff; punitive damages for individual and entity assessed; unique special verdict forms detailing each cause of action with requisite burden of proof
- § 11:5 Police officers were called to a public sports complex regarding a person—soon to be decedent—acting erratically and interfering with a youth soccer game; soccer dads were attempting to corral decedent with a soccer goal post/net when officers arrived; decedent ignored the officer's commands and ran up into the bleachers; decedent turned with a stick in his hand; officers shot him and he died; new and revised May 2021 jury instructions on negligent use of deadly force by police officer and battery by police officer (use of deadly force); new verdict form; liability bifurcated from damages; modified causation instructions; plaintiff (decedent's mother) alleged deadly force unnecessary because officers armed with Tasers; comparative negligence; special verdict form

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- § 12:3 Evidence Instructions to Give Before Substantive Instructions
- § 12:4 Final Post Trial Admonitions to Give After Substantive Instructions
- § 12:5 General and Special Verdict Forms: Alert—Revised CACI 5022. Introduction to General Verdict Form
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