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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHARLA CONN and DUSTIN CONN,

Plaintiffs,

3:05-cv-00595-HDM-WGC

vs.

SPECIAL VERDICT

OFFICERS RYAN ASHTON and DAVID
ROBERTSON,

Defendants.

We, the jury, in the above-entitled action, find the following special verdict:

QUESTION NO. 1:

Have the Plaintiffs Charla Conn and Dustin Conn proved by a preponderance of the evidence that their mother Brenda Clustka had a serious medical need, that is, an actual heightened risk of suicide, on April 26, 2005?

YES _____ NO _____

(If you answered "Yes" in Question No. 1, go to Question No. 2. If you answered "No" in Question No. 1, please date and sign this form.)

QUESTION NO. 2:

Have the Plaintiffs Charla Conn and Dustin Conn proved by a preponderance of the evidence that the Defendants violated their mother Brenda Clustka's Eighth and Fourteenth Amendment rights by proving the Defendants were subjectively aware of Brenda

1 Clustka's serious medical need and failed to respond to that
2 serious medical need on April 26, 2005?

3 Defendant Ryan Ashton YES _____ NO ✓

4 Defendant David Robertson YES _____ NO ✓

5 (If you answered "Yes" for either defendant in Question No. 2,
6 go to Question No. 3. If you answered "No" for both defendants in
7 Question No. 2, please date and sign this form.)

8 QUESTION NO. 3:

9 Have the Plaintiffs Charla Conn and Dustin Conn proved by a
10 preponderance of the evidence that the Defendants' violation of
11 their mother Brenda Clustka's constitutional rights was the
12 actual cause of Brenda Clustka's suicide on April 28, 2005?

13 Defendant Ryan Ashton YES _____ NO ✓

14 Defendant David Robertson YES _____ NO ✓

15 (If you answered "Yes" for either defendant in Question No. 3,
16 go to Question No. 4. If you answered "No" for both defendants in
17 Question No. 3, please date and sign this form.)

18 QUESTION NO. 4:

19 Have the Plaintiffs Charla Conn and Dustin Conn proved by a
20 preponderance of the evidence that the Defendants' violation of
21 their mother Brenda Clustka's constitutional rights was the
22 proximate cause of Brenda Clustka's suicide on April 28, 2005?

23 Defendant Ryan Ashton YES _____ NO ✓

24 Defendant David Robertson YES _____ NO ✓

25 (If you answered "Yes" for either defendant in Question No. 4,
26 go to Question No. 5. If you answered "No" for both defendants in
Question No. 4, please date and sign this form.)

QUESTION NO. 5:

Have the defendants Ryan Ashton and David Robertson proved by
a preponderance of the evidence that they are entitled to qualified
good faith immunity?

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Defendant Ryan Ashton YES _____ NO _____
Defendant David Robertson YES _____ NO _____

(If you answered "No" for either defendant in Question No. 5, go to Question No. 6. If you answered "Yes" for both defendants in Question No. 5, please date and sign this form.)

QUESTION NO. 6:

If you have found in favor of both defendants on plaintiffs' claim, you are not to answer this question but instead date and sign this special verdict. You may award damages against only those defendants whom you have found are liable to the plaintiffs under the law and facts of this case. If you have so found, you should then answer the following:

We the jury find in favor of Plaintiff Charla Conn and against the following defendant(s):

Defendant Ryan Ashton

Defendant David Robertson

and assess damages in the amount of \$ _____.

We the jury find in favor of Plaintiff Dustin Conn and against the following defendant(s):

Defendant Ryan Ashton

Defendant David Robertson

and assess damages in the amount of \$ _____.

Please date and sign this form.

Dated: 3-14-2012

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Foreperson