

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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RAYMOND D. SHAW,

Plaintiff,

v.

STEVE HELGERSON and LORI ALSUM,

Defendants.

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SPECIAL VERDICT

10-cv-598-slc

We, the jury, for our special verdict, do find as follows:

Question No. 1: Did plaintiff Raymond Shaw have a serious medical need between December 11, 2008 and February 23, 2009?

Answer: \_\_\_\_\_  
(Yes or No)

If your answer to Question No. 1 was "Yes," then answer Question No. 2.

If your answer to Question No. 1 was "No," then do not answer any more questions and proceed to the end of this verdict form.

Question No. 2: Were either of the following defendants aware that plaintiff Shaw had a serious medical need: (Answer Yes or No for each defendant listed.)

Defendant Helgersen? \_\_\_\_\_  
(Yes or No)

Defendant Alsum? \_\_\_\_\_  
(Yes or No)

If your answer to Question No. 2 was “Yes” as to a defendant,  
then answer Question No. 3 as to that defendant.

If your answer to Question No. 2 was “No” as to both defendants,  
then do not answer any more questions and proceed to the end of  
this verdict form.

Question No. 3: Did either of the following defendants consciously disregard plaintiff  
Shaw’s serious medical need by failing to schedule him for a nursing evaluation or doctor’s  
appointment between December 11, 2008 and February 23, 2009?

Defendant Helgerson? \_\_\_\_\_  
(Yes or No)

Defendant Alsum? \_\_\_\_\_  
(Yes or No)

If your answer to Question No. 3 was “Yes” as to a defendant,  
then answer Question No. 4 and also answer Question No. 5 as  
to that defendant.

If your answer to Question No. 3 was “No,” as to both defendants,  
then do not answer any more questions and proceed to the end of  
this verdict form.

Question No. 4: What amount of money, if any, will fully and fairly compensate plaintiff  
for the harm caused by the specified defendant?

Defendant Helgerson: \$ \_\_\_\_\_

Defendant Alsum: \$ \_\_\_\_\_

Question No. 5: Did either defendant's conduct demonstrate a willful or reckless disregard for plaintiff's constitutional rights?

Defendant Helgersen: \_\_\_\_\_  
(Yes or No)

Defendant Alsum: \_\_\_\_\_  
(Yes or No)

If your answer to Question No. 5 was "Yes" as to a defendant, then answer Question No. 6 as to that defendant.

If your answer to Question No. 5 was "No" as to both defendants, then do not answer Question No. 6 but proceed to the end of the verdict form.

Question No. 6: What amount of money, if any, do you award as punitive damages?

Defendant Helgersen: \$ \_\_\_\_\_

Defendant Shaw: \$ \_\_\_\_\_

\_\_\_\_\_  
Presiding Juror

Madison, Wisconsin

Date: \_\_\_\_\_