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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TOTAL RECALL TECHNOLOGIES,

Plaintiff,

No. C 15-02281 WHA

v.

PALMER LUCKEY,

Defendant.

**SPECIAL JURY VERDICT FORM  
FOR PHASE ONE TRIAL**

United States District Court  
Northern District of California

YOUR ANSWERS MUST BE UNANIMOUS. YOU MUST FOLLOW THE COURT'S FINAL CHARGE  
TO THE JURY.

1. Has defendant proven his affirmative defense that his consent to the contractual  
obligations at issue was obtained by fraud?

Yes \_\_\_\_\_

No  \_\_\_\_\_

IF YOUR ANSWER IS "YES," THEN YOU ARE DONE; GO TO THE END, AND SIGN AND DATE THE  
VERDICT FORM. OTHERWISE, GO TO QUESTIONS 2 AND 3.

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United States District Court  
Northern District of California

2. Has plaintiff TRT proven that Luckey breached his contractual obligation to TRT and that this breach was a substantial and foreseeable factor in causing TRT's harm?

Yes \_\_\_\_\_ No           ✓          

If you answered "yes," then state your reason(s) for your finding that Luckey breached.

\_\_\_\_\_  
\_\_\_\_\_

3. With respect to plaintiff's claim of constructive fraud, has plaintiff proven that Luckey and TRT were in a confidential relationship (within the meaning of the final charge to the jury)?

Yes \_\_\_\_\_ No           ✓          

IF YOUR ANSWER IS "YES," THEN GO TO THE NEXT QUESTION. OTHERWISE, GO TO THE END AND SIGN AND DATE THE VERDICT FORM.

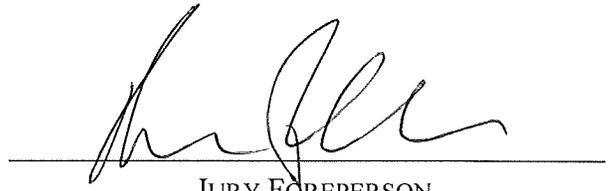
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4. Has plaintiff TRT proven that Luckey committed constructive fraud?

Yes \_\_\_\_\_

No \_\_\_\_\_ ✓

Dated: October 13, 2021.



JURY FOREPERSON

AARON POLLOCK

United States District Court  
Northern District of California