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4	UNITED STATES	S DISTRICT COURT
5	NORTHERN DISTR	RICT OF CALIFORNIA
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7	AARON VELARDE, et al.,	Case No. <u>13-cv-04011-JD</u>
8	Plaintiffs,	PROPOSED SPECIAL VERDICT FORM
9	V.	
10	UNION CITY POLICE DEPARTMENT, et al.,	
11	Defendants.	
12		
13	The Court proposes to provide the jury v	with this special verdict form on December 11,
14	2015. The parties have until 7:30 a.m. on Decen	mber 11, 2015 to file any objections to this
15	proposed verdict form.	
16	IT IS SO ORDERED.	
17	Dated: December 10, 2015	\sim
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20		JAMES CONATO United States District Judge
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United States District Court Northern District of California

1	Your answers must be unanimous:	
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3	Question No. 1: Section 1983 Excessive Force under the Fourth Amendment	
4	Do you find by a preponderance of the evidence that one or more of the defendants violated Heide	
5	Velarde's Fourth Amendment rights by using unreasonable force against her?	
6	BaumgartnerYESNO	
7	J. MartinYESNO	
8		
9	Question No. 2: Section 1983 Unlawful Arrest under the Fourth Amendment	
10	Do you find by a preponderance of the evidence that one or more of the defendants violated Heide	
11	Velarde's Fourth Amendment rights by arresting her without probable cause?	
12	BaumgartnerYESNO	
13	J. MartinYESNO	
14		
15	Question No. 3: State Law Assault	
16	Do you find by a preponderance of the evidence that one or more of the defendants assaulted	
17	Heide Velarde?	
18	BaumgartnerYESNO	
19	J. MartinYESNO	
20		
21	Question No. 4: State Law Battery	
22	Question No. 4: State Law Battery	
	Question No. 4: State Law Battery Do you find by a preponderance of the evidence that one or more of the defendants battered Heide	
23		
23 24	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide	
	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide Velarde?	
24	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide Velarde? BaumgartnerYESNO	
24 25	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide Velarde? BaumgartnerYESNO	
24 25 26	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide Velarde? BaumgartnerYESNO	
24 25 26 27	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide Velarde? BaumgartnerYESNO	

United States District Court Northern District of California

1	Question No. 5: State Law False Arrest	
2	Do you find by a preponderance of the evidence that one or more of the defendants wrongfully	
3	arrested Heide Velarde?	
4	BaumgartnerYESNO	
5	J. MartinYESNO	
6		
7	Question No. 6: Damages	
8	Answer this question only if you answered "yes" in at least one of Questions 1 through 5.	
9	What amount of damages has Heide Velarde proven by a preponderance of evidence that will	
10	fairly and reasonably compensate her for her injury?	
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14	Dated: FOREPERSON	
15	TOREIERSON	
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United States District Court Northern District of California