

IN THE IOWA DISTRICT COURT FOR HANCOCK COUNTY

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BRUCE D. JOHNSON,)	
)	
Plaintiff,)	LAW NO. LACV019580
)	
v.)	
)	PLAINTIFF'S AMENDED
SHAWN DOUGLAS MEWES,,)	REQUESTED JURY
ELIASON TRUCKING, INC.,)	INSTRUCTIONS
AND PROGRESSIVE CASUALTY)	
INSURANCE COMPANY)	
)	
Defendant.)	

COMES NOW Plaintiff, Bruce David Johnson, and submits to the Court the following Amended Requested Jury Instructions, adding UJI 200.37.

I - UNIFORM JURY INSTRUCTIONS

1. UJI 100.1 – Statement of the Case – “Members of the Jury: In this case, Plaintiff, Bruce David Johnson (“JOHNSON”) claims that on August 12, 2015, as a result of the negligence of Defendant Eliason Trucking (“ELIASON”) he was injured. Defendant admits that it was negligent and that it’s negligence was the cause of the accident, but denies the extent of Plaintiff’s claim.

Do not consider this summary as proof of any claim. Decide the facts from the evidence and apply the law, which I will now give you.”

- 2. UJI 100.2 – Duties of Judge and Jury, Instructions as a Whole.
- 3. UJI 100.3 - Burden of Proof, Preponderance of Evidence.
- 4. UJI 100.4 - Evidence.

5. UJI 100.5 - Deposition testimony.
6. UJI 100.6- Interrogatories
7. UJI 100.9 - Credibility of Witnesses.
8. UJI 100.11 - Hypothetical Question, Expert Testimony.
9. UJI 100.12 - Opinion Evidence, Expert Witness.
10. UJI 700.1 - Essentials for Recovery - “Defendant has admitted negligence.”
11. UJI 700.3 - Cause.
12. UJI 200.1 - Elements - Personal Injury.
13. UJI 200.8 - Loss of Time - Earnings.
14. UJI 200.9 - Loss of Future Earning Capacity
15. UJI 200.10 - Loss of Full Mind and Body - Past.
16. UJI 200.11B - Loss of Full Mind and Body - Future.
17. UJI 200.12 - Physical Pain and Suffering - Past.
18. UJI 200.13B - Physical and Mental Pain and Suffering - Future.
19. UJI 200.38 - Quotient Verdict.
20. UJI 300.4 - Single Plaintiff, Single Defendant - Questions 1,2,3 and 8, adding all elements of damage.
21. UJI 100.23 - Use of Electronic Devices.
22. UJI 100.18 - General Instructions to Jury.
23. UJI 100.21 - Cautionary Instruction.
24. UJI 200.37 - Mortality Tables - Personal Injury. A Standard Mortality Table indicates the normal life expectancy of people who are the same age as Plaintiff is 26.52 years.

The statistics from a Standard Mortality Table are not conclusive. You may use this information, together with all the other evidence, about Johnson's health, habits, occupation, and lifestyle, when deciding issues of future damages.

PISCOPO LAW FIRM, P.L.C.

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