

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CODA DEVELOPMENT, S.R.O., et al.,)	CASE NO. 5:15-cv-1572
)	
PLAINTIFFS,)	JUDGE SARA LIOI
)	
vs.)	
)	VERDICT FORMS
GOODYEAR TIRE & RUBBER CO., et al.,)	
)	
DEFENDANTS.)	

In answering the following questions and filling out the Verdict Forms, you are to follow all the Jury Instructions I have given. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

In this Verdict Form:

“Coda” refers collectively to plaintiffs Coda Development s.r.o., Coda Innovations s.r.o., and Frantisek Hrabal.

“Goodyear” refers collectively to defendants The Goodyear Tire & Rubber Company and Robert Benedict.

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Coda Development s.r.o., et al. v. The Goodyear Tire & Rubber Co., et al.
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1. Has Coda proven by a preponderance of the evidence that, in January 2009 and/or June 2009, it possessed specific, identifiable trade secrets that derive independent economic value, actual or potential, from not being generally known to or readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use?

Please check the boxes below that reflect your verdict for each listed trade secret.

Listed Trade Secret	Yes (finds for Coda)	No (finds for Goodyear)
1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have all "No" answers for this Question 1, then STOP answering questions; go to the last page and sign the verdict form.

Verdict form continues on the next page, if you checked "Yes" in any box above.

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2. For each listed trade secret where you answered “Yes” in Question 1, has Coda proven by a preponderance of the evidence that Goodyear misappropriated Coda’s trade secrets?

Please check the boxes below that reflect your verdict for each listed trade secret.

IMPORTANT: You may ONLY answer this Question 2 for a particular listed trade secret if you answered “Yes” to Question 1 for that same listed trade secret. If you answered “No” to Question 1 for a particular listed trade secret, DO NOT answer Question 2 for that same listed trade secret.

Listed Trade Secret	Yes (finds for Coda)	No (finds for Goodyear)
1	<input type="checkbox"/>	<input type="checkbox"/>
2	<input type="checkbox"/>	<input type="checkbox"/>
3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	<input type="checkbox"/>	<input type="checkbox"/>
20	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	<input type="checkbox"/>	<input type="checkbox"/>
23	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25	<input type="checkbox"/>	<input type="checkbox"/>

If you have all “No” answers for this Question 2, then STOP answering questions; go to the last page and sign the verdict form.

Verdict form continues on the next page, if you checked “Yes” in any box above.

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3. For each listed trade secret where you answered “Yes” in Question 2, has Coda proven by a preponderance of the evidence that Coda suffered damage proximately caused by the misappropriation?

Please check the boxes below that reflect your verdict for each listed trade secret.

IMPORTANT: You may ONLY answer this Question 3 for a particular listed trade secret if you answered “Yes” to Questions 2 for that same listed trade secret. If you answered “No” to Questions 1 or 2 for a particular listed trade secret, DO NOT answer Question 3 for that same listed trade secret.

Listed Trade Secret	Yes (finds for Coda)	No (finds for Goodyear)
1	<input type="checkbox"/>	<input type="checkbox"/>
2	<input type="checkbox"/>	<input type="checkbox"/>
3	<input type="checkbox"/>	<input type="checkbox"/>
5	<input type="checkbox"/>	<input type="checkbox"/>
7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	<input type="checkbox"/>	<input type="checkbox"/>
20	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	<input type="checkbox"/>	<input type="checkbox"/>
23	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25	<input type="checkbox"/>	<input type="checkbox"/>

If you have all “No” answers for this Question 3, then STOP answering questions; go to the last page and sign the verdict form.

Verdict form continues on the next page, if you DID check “Yes” in any box above.

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4. What amount of compensatory damages do you award to Coda for its actual loss caused by Goodyear's trade secret misappropriation? (State the amount or, if you find that Coda failed to prove by the greater weight of the evidence any amount of damages, set forth a nominal amount such as \$1.00. Do not include punitive damages in this calculation.)

Please fill in a dollar amount below that reflects your verdict.

\$ 2.8 million

Verdict form continues on the next page.

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5. Has Coda proven by clear and convincing evidence that Goodyear's misappropriation was willful and malicious?

Please check the box below that reflects your verdict.

Yes (finds for Coda)	No (finds for Goodyear)
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered **Yes**, what punitive damages, if any, do you find Coda is entitled to?

Please fill in a dollar amount below that reflects your verdict.

\$ 61.2 million
Sixty one . 2 million

Verdict form continues on the next page.

