

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO. 2017-CP-10-2758

JEANE WHITFIELD, )  
 )  
Plaintiff, )

**VERDICT FORM**

vs. )

DENNIS K. SCHIMPF, M.D. and )  
SWEETGRASS PLASTIC SURGERY, LLC )

Defendants. )

**RECEIVED**

OCT 11 2019

**SC Court of Appeals**

2019 SEP 11 AM 10:09  
JULIE J. ARNOLD  
CLERK OF COURT  
FILED

**VERDICT FORM**

1. Did the Plaintiff prove by a greater weight or preponderance of the evidence that the Defendants deviated from the standard of care?

\_\_\_\_ YES.

NO.

**If your answer to Question 1 is NO, you are finished. You have found for the Defendants. Please stop and notify the bailiff. If your answer is YES, please continue to Question 2.**

2. Did the Plaintiff prove by a greater weight or preponderance of the evidence that the Defendants deviation from the standard of care was the proximate cause of Plaintiff's injuries?

\_\_\_\_ YES.

\_\_\_\_ NO.

**If your answer to Question 2 is NO, you are finished. You have found for the Defendants. Please stop and notify the bailiff. If your answer is YES, please continue to Question 3.**

3. Did the Defendants prove by the greater weight or preponderance of the evidence that the Plaintiff, Jeane Whitfield, was also negligent?

\_\_\_\_\_ YES – Go to Question 4.

\_\_\_\_\_ NO – Go to Question 7.

4. Did the Defendants prove by the greater weight or preponderance of the evidence that the Plaintiff's negligence was the proximate cause of Plaintiff's injuries?

\_\_\_\_\_ YES – Go to Question 5.

\_\_\_\_\_ NO – Go to Question 7.

5. Considering the combined negligence that proximately caused the Plaintiff's injuries as 100%, what percentage of that negligence is attributable to the Plaintiff and what percentage is attributable to the Defendants? [The percentages must add up to 100%].

Plaintiff: \_\_\_\_\_ %

Defendants: \_\_\_\_\_ %

6. Was the Plaintiff's negligence greater than 50%?

\_\_\_\_\_ YES – You are finished. Please stop your deliberations and notify the bailiff.

\_\_\_\_\_ NO – Go to Question 7.


7. State the amount of actual damages, if any, sustained by the Plaintiff. [DO NOT reduce the Plaintiff's total damages based on the percentage of negligence by any party. You are to determine *only* the total amount of the Plaintiff's damages and enter that amount below.]

\$ \_\_\_\_\_ Actual Damages (to include: pain and suffering, loss of enjoyment of life, mental suffering, and prospective damages)

8. State the amount of punitive damages, if any, sustained by the Plaintiff. You may award punitive damages only if you awarded actual damages in response to Question 7 above and only if you find by clear and convincing evidence that Defendants' actions harmed Plaintiff and were willful, wanton, or reckless. [DO NOT reduce the Plaintiff's total damages based on the percentage of negligence by any party. You are to determine only the total amount of the Plaintiff's damages and enter that amount below.]

\$ \_\_\_\_\_ Punitive Damages

I certify this decision was the unanimous decision of the jury.



\_\_\_\_\_  
Foreperson  
August 30, 2019