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18 UNITED STATES DISTRICT COURT  
19 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

20 MARCUS GRAY, et al.,  
21 Plaintiffs,  
22  
23 v.  
24 KATHERYN ELIZABETH HUDSON,  
et al.,  
25 Defendants.

CASE NO. 2:15-cv-05642-CAS (JCx)  
Honorable Christina A. Snyder  
**DEFENDANTS’ PROPOSED  
SPECIAL VERDICT FORM –  
DAMAGES [REDACTED]**  
Filed: July 1, 2014  
Trial: July 17, 2019

We the jury in the above-entitled action answer the questions submitted to us as follows:

**Question 1:**

Did Plaintiffs prove, by a preponderance of the evidence, that there is a causal nexus between Defendants' gross revenue and the use of the "Joyful Noise" musical composition in ostinato #2 in "Dark Horse"?

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

If you answer Question 1 "No," turn to the last page, sign and return this verdict.

If you answer Question 1 "Yes," then proceed to answer Question 2.

**Question 2:**

The parties have stipulated to the following net profit amounts (also known as net receipts) earned by Defendants other than Capitol Records, LLC from “Dark Horse”:

Jordan Houston: XXXXXX

Karl Martin Sandberg: XXXXXX

Lukasz Gottwald: XXXXXX

Kasz Money, Inc.: XXXXXX

Henry Russell Walter: XXXXXX

Sarah Hudson: XXXXXX

Katheryn Elizabeth Hudson: XXXXXX

Kobalt Music Publishing America, Inc.: XXXXXX

WB Music Corp.: XXXXXX

Please state the amount of net profits, if any, earned by Capitol Records, LLC from “Dark Horse.”

Answer: \$ \_\_\_\_\_

Please proceed to Question 3.

**Question 3:**

What percentage, if any, of the net profits earned by Defendants from “Dark Horse” is attributable to the use of the “Joyful Noise” musical composition in ostinato #2 in “Dark Horse” as opposed to other factors?

Answer: \$ \_\_\_\_\_

Please proceed to Question 4.

**Question 4:**

Please multiply the amount of net profits earned by each Defendant identified in Question 2 by the percentage you determined in Question 3, and state the resulting amount for each Defendant below.

Jordan Houston: \$ \_\_\_\_\_

Karl Martin Sandberg: \$ \_\_\_\_\_

Lukasz Gottwald: \$ \_\_\_\_\_

Kasz Money, Inc.: \$ \_\_\_\_\_

Henry Russell Walter: \$ \_\_\_\_\_

Sarah Hudson: \$ \_\_\_\_\_

Katheryn Elizabeth Hudson: \$ \_\_\_\_\_

Kobalt Music Publishing America, Inc.: \$ \_\_\_\_\_

WB Music Corp.: \$ \_\_\_\_\_

Capitol Records, LLC: \$ \_\_\_\_\_

Please continue to the next page.

The foreperson should now sign this verdict form.

Dated: \_\_\_\_\_

By: \_\_\_\_\_

PRESIDING JUROR

After this verdict form has been signed, notify the clerk that you are ready to present your verdict in the courtroom.