

FILED
SAN MATEO COUNTY

AUG 11 2026

Clerk of the Superior Court
By
DEPUTY CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO

MADISON AMMEN and OLIVIA AMMEN, by
and through their Guardian *Ad Litem* Liza Spiridon,

Plaintiffs,

v.

CESAR SALTO MORALES; SUSANA SALTO
ALVAREZ; ARNOLD A. MORALES; EMILIANO
SALTO and DOES 4 through 20, inclusive,

Defendants.

CASE NO. 23-CIV-02538

VERDICT FORMS

VERDICT FORMS; CASE NO. 23-CIV-02538

1 **VERDICT FORM NO. 1**

2 **NEGLIGENCE**

3
4 We answer the questions submitted to us as follows:

5
6 1. Was Cesar Morales negligent?

7 ☒ Yes ☐ No

8 If you answered yes in question 1, then answer question 2 for that defendant. If you answered no
9 in question 1, then insert the number zero next to Cesar Morales's name in Apportionment of
10 Fault, Verdict Form No. 5.

11
12 2. If Cesar Morales received a "yes" answer in question 1, answer the following:

13 Was Cesar Morales's negligence a substantial factor in causing harm to Madison and Olivia
14 Ammen?

15 ☒ Yes ☐ No

16 If you answered no, then insert the number zero next to Cesar Morales's name in Apportionment
17 of Fault, Verdict Form No. 5. If you answered yes to question 2, then include a percentage of fault
18 for Cesar Morales in Apportionment of Fault, Verdict Form No. 5.

19
20 3. Was Grace Spiridon negligent?

21 ☐ Yes ☒ No

22 If you answered yes in question 3, then answer question 4 for that person. If you answered no for
23 question 3, insert the number zero next to Grace Spiridon's name in Apportionment of Fault,
24 Verdict Form No. 5.

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1 4. If Grace Spiridon received a "yes" answer in question 3, answer the following:

2 Was Grace Spiridon's negligence a substantial factor in causing harm to Madison and Olivia
3 Ammen?

4 ☐ Yes ☐ No

5 If you answered no in question 4, then insert the number zero next to Grace Spiridon's name in
6 Apportionment of Fault, Verdict Form No. 5. If you answered yes in question 4, then include a
7 percentage of fault for Grace Spiridon in Apportionment of Fault, Verdict Form No. 5.
8

9 5. Was Kyle Harrison negligent?

10 ☒ Yes ☐ No

11 If you answered yes in question 5, then answer question 6 for that person. If you answered no for
12 question 5, insert the number zero next to Kyle Harrison's name in Apportionment of Fault,
13 Verdict Form No. 5.
14

15 6. If Kyle Harrison received a "yes" answer in question 5, answer the following:

16 Was Kyle Harrison's negligence a substantial factor in causing harm to Madison and Olivia
17 Ammen?

18 ☒ Yes ☐ No

19 If you answered no in question 6, then insert the number zero next to Kyle Harrison's name in
20 Apportionment of Fault, Verdict Form No. 5. If you answered yes in question 6, then include a
21 percentage of fault for Kyle Harrison in Apportionment of Fault, Verdict Form No. 5.
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25 Signed: 

26 Presiding Juror

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28 Dated: 8/11/2026

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After *all* verdict forms have been signed, notify the [clerk/bailiff/court attendant] that you are ready to present your verdict in the courtroom.

(Proceed to Verdict Form No. 2.)

1 **VERDICT FORM NO. 2**

2 **NEGLIGENT ENTRUSTMENT (against Arnold Morales and Susana Salto Alvarez)**

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4 We answer the questions submitted to us as follows:

- 5
6 1. Was Cesar Morales negligent in operating the vehicle?

7 ☒ Yes ☐ No

8 If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer
9 no further questions, and have the presiding juror sign and date this form.

- 10
11 2. Did Arnold Morales or Susana Salto Alvarez own the vehicle operated by Cesar Morales or did
12 Arnold Morales or Susana Salto Alvarez have possession of the vehicle operated by Cesar
13 Morales with the owner's permission?

14 ☐ Yes ☒ No

15 If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer
16 no further questions, and have the presiding juror sign and date this form.

- 17
18 3. Did Arnold Morales or Susana Salto Alvarez know, or should Arnold Morales or Susana Salto
19 Alvarez have known, that Cesar Morales was incompetent or unfit to drive?

20 ☐ Yes ☐ No

21 If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer
22 no further questions, and have the presiding juror sign and date this form.

- 23
24 4. Did Arnold Morales or Susana Salto Alvarez permit Cesar Morales to drive the vehicle?

25 ☐ Yes ☐ No

26 If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer
27 no further questions, and have the presiding juror sign and date this form.

28 ///

1 5. Was Cesar Morales's incompetence or unfitness to drive a substantial factor in causing harm to
2 Madison and Olivia Ammen?

3 _____ Yes _____ No

4 If your answer to question 5 is yes, have the presiding juror sign and date this form, then include
5 a percentage of fault for Arnold Morales and/or Susana Salto Alvarez in Apportionment of Fault,
6 Verdict Form No. 5. If you answered no, have the presiding juror sign and date this form.

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9 Signed: _____

10 Presiding Juror

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12 Dated: _____

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14 After *all* verdict forms have been signed, notify the [clerk/bailiff/court attendant] that you are
15 ready to present your verdict in the courtroom.

16 (Proceed to Verdict Form No. 3.)
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1 **VERDICT FORM NO. 3**

2 **NEGLIGENT SUPERVISION (against Arnold Morales and Susana Salto Alvarez)**

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4 We answer the questions submitted to us as follows:

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- 6 1. Was Arnold Morales or Susana Salto Alvarez aware of habits or tendencies of Cesar Morales that
- 7 created an unreasonable risk of harm to other persons and led to Madison and Olivia's harm?

8 ☒ Yes ☐ No

9 If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer

10 no further questions, and have the presiding juror sign and date this form.

- 11
- 12 2. Did Arnold Morales or Susana Salto Alvarez have the opportunity and ability to control the
- 13 conduct of Cesar Morales?

14 ☒ Yes ☐ No

15 If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer

16 no further questions, and have the presiding juror sign and date this form.

- 17
- 18 3. Was Arnold Morales or Susana Salto Alvarez negligent because he/she failed to exercise
- 19 reasonable care to prevent Cesar Morales's conduct?

20 ☒ Yes ☐ No

21 If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer

22 no further questions, and have the presiding juror sign and date this form.

- 23
- 24 4. Was Arnold Morales or Susana Salto Alvarez's negligence a substantial factor in causing harm to
- 25 Madison and Olivia Ammen?

26 ☒ Yes ☐ No

1 If your answer to question 4 is yes, have the presiding juror sign and date this form, then include
2 a percentage of fault for Arnold Morales and/or Susana Salto Alvarez in Apportionment of Fault,
3 Verdict Form No. 5. If you answered no, have the presiding juror sign and date this form.

4 Signed: 

5 Presiding Juror

6 Dated: 8/11/2026

7
8 After *all* verdict forms have been signed, notify the [clerk/bailiff/court attendant] that you are
9 ready to present your verdict in the courtroom.
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11 (Proceed to Verdict Form No. 4.)
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VERDICT FORM NO. 4

DAMAGES FOR WRONGFUL DEATH

We answer the questions submitted to us as follows:

1. What are Madison and Olivia Ammen's economic damages?

a. Past financial support that Grace Spiridon and Greg Ammen would have contributed to
Olivia and Madison: \$ 3,372,602

b. Future financial support that Grace Spiridon and Greg Ammen would have contributed to
Olivia and Madison: \$ 14,576,540

c. Household services that Grace Spiridon and Greg Ammen would have contributed to
Olivia and Madison: \$ 877,362

Total Economic Damages \$ 18,826,504

2. What are Madison Ammen's noneconomic damages?

a. The loss of Grace Spiridon and Greg Ammen's love, companionship, comfort, care,
assistance, protection, affection, society, and moral support, and Grace Spiridon and Greg
Ammen's training and guidance from November 4, 2022 to the present:

\$ 4,000,000

b. The loss of Grace Spiridon and Greg Ammen's love, companionship, comfort, care,
assistance, protection, affection, society, and moral support, and Grace Spiridon and Greg
Ammen's training and guidance from today forward:

\$ 3,000,000

Total Noneconomic Damages: \$ 7,000,000

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1 3. What are Olivia Ammen's noneconomic damages?

2 a. The loss of Grace Spiridon and Greg Ammen's love, companionship, comfort, care,
3 assistance, protection, affection, society, and moral support, and Grace Spiridon and Greg
4 Ammen's training and guidance from November 4, 2022 to the present:

5 \$ 4,000,000

6 b. The loss of Grace Spiridon and Greg Ammen's love, companionship, comfort, care,
7 assistance, protection, affection, society, and moral support, and Grace Spiridon and Greg
8 Ammen's training and guidance from today forward:

9 \$ 3,000,000

10 Total Noneconomic Damages: \$ 7,000,000

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14 Signed: 

15 Presiding Juror

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17 Dated: 8/11/2026

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19 *After this verdict form has been signed, notify the clerk/bailiff/court attendant that you are ready*
20 *to present your verdict in the courtroom.*

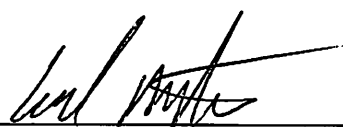
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22 (Proceed to Verdict Form No. 5.)
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VERDICT FORM NO. 5
APPORTIONMENT OF FAULT

We answer the questions submitted to us as follows:

1. What percentage of responsibility for Madison and Olivia Ammen's harm do you assign to the following? Insert a percentage for only those who received "yes" answers in Negligence questions 2, 4, and 6, or, if you answered "yes" to Negligent Entrustment question 5 or Negligent Supervision question 4, include a percentage of fault for Arnold Morales and/or Susana Salto Alvarez.

Cesar Morales:	<u>60</u> %
Arnold Morales:	<u>20</u> %
Susana Salto Alvarez:	<u>5</u> %
Grace Spiridon:	<u>0</u> %
Kyle Harrison:	<u>15</u> %
TOTAL	100%

Signed: 

Presiding Juror

Dated: 8/11/2026

1 *After this verdict form has been signed, notify the clerk/bailiff/court attendant that you are ready*
2 *to present your verdict in the courtroom.*

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