IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY,
FLORIDA.

CASE NO.: 502012CA023358XXXXMBAG

JAMES TODD WAGNER, SUPERCAR ENGINEERING, INC., a Florida Corporation

Plaintiffs,

vs.

WARREN MOSLER, MOSLER AUTO CARE CENTER, INC. ("MACC"), a Florida Corporation, d/b/a Mosler Automotive

Defendants.
_____/

VERDICT FORM

COUNT A – SEI'S CLAIM FOR UNJUST ENRICHMENT AGAINST MACC

For SEI's unjust enrichment claim against MACC as to automotive work, engineering work, and/or work to obtain EPA approvals to MACC between April 16, 2011, and September 28, 2011, please answer the following questions:

1. Did SEI establish by the greater weight of the evidence that SEI conferred the benefit of automotive work, engineering work, and/or work to obtain EPA approvals to MACC between April 16, 2011, and September 28, 2011 (the "Work")?

   Yes ✓ No_____

   If your answer to this question is "no," you should then proceed to question 7 and skip the intervening questions, and your verdict is for MACC on the issues of unjust enrichment.

   If your answer to this question is "yes," then answer question 2.

2. Did SEI establish by the greater weight of the evidence that MACC knowingly and voluntarily accepted and retained the Work bestowed by SEI?

   Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 7 and skip the intervening questions, and your verdict is for MACC on the issues of unjust enrichment.

If your answer to this question is "yes," then answer question 3.

3. Did SEI establish by the greater weight of the evidence that MACC's retention of the benefit is inequitable unless MACC pays to SEI the value of the Work?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 7 and skip the intervening questions, and your verdict is for MACC on the issues of unjust enrichment.

If your answer to this question is "yes," then answer question 4.

4. Does the greater weight of the evidence establish the following defenses by MACC to SEI's unjust enrichment claim?

a. SEI was paid for the Work Yes____ No ✓

b. An express agreement governs the Work Yes____ No ✓

c. SEI was paid under the Consultant Agreement With MACC Yes____ No ✓

If your answer to any of the above questions is "yes," then your verdict is for MACC on the issues of unjust enrichment. You should then proceed to question 7 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 5.

5. Did SEI establish, with reasonable certainty, the value of the Work, SEI conferred?

Yes_____ No ✓

If your answer to this question is "no," then proceed to question 7 and skip the intervening questions.

If your answer to this question is "yes," then answer question 6.

6. What is the value of the Work that should in fairness be paid to SEI, if not already paid?

$\$$_____

After inserting a number above, then please answer the next question.

COUNT B – SEI'S CLAIM FOR QUANTUM MERUIT AGAINST MACC

For SEI's Quantum Meruit claim against MACC as to automotive work, engineering work, and/or work to obtain EPA approvals to MACC between April 16, 2011, and September 28, 2011, please answer the following questions:

7. Did SEI establish by the greater weight of the evidence that SEI provided a benefit to MACC in the form of automotive work, engineering work, and/or work to obtain EPA approvals to MACC between April 16, 2011, and September 28, 2011 (the "Work")?

   Yes ✓ No_____

   If your answer to this question is "no," you should then proceed to question 13 and skip the intervening questions, and your verdict is for MACC on the issues of Quantum Meruit.

   If your answer to this question is "yes," then answer question 8.

8. Did SEI establish by the greater weight of the evidence that under ordinary circumstances a reasonable person would expect to pay for the benefit of the Work?

   Yes ✓ No_____

   If your answer to this question is "no," you should then proceed to question 13 and skip the intervening questions, and your verdict is for MACC on the issues of Quantum Meruit.

   If your answer to this question is "yes," then answer question 9.

9. Did SEI establish by the greater weight of the evidence that MACC failed to pay SEI for the Work?

   Yes ✓ No_____

   If your answer to this question is "no," you should then proceed to question 13 and skip the intervening questions, and your verdict is for MACC on the issues of Quantum Meruit.

If your answer to this question is "yes," then answer question 10.

10. Does the greater weight of the evidence establish the following defenses by MACC to SEI's Quantum Meruit claim?

a. SEI was paid for the Work Yes____ No✓____

b. An express agreement governs the Work Yes____ No✓____

c. SEI was paid under the Consultant Agreement Yes____ No✓____

If your answer to any of the above questions is "yes," then your verdict is for MACC on the issues of Quantum Meruit. You should then proceed to question 13 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 11.

11. Did SEI establish, with reasonable certainty, that MACC caused it to suffer damages?

Yes✓_____ No_____

If your answer to this question is "no," then proceed to question 13 and skip the intervening questions.

If your answer to this question is "yes," then answer question 12.

12. What is the amount of money that under the ordinary circumstances a reasonable person would reasonably expect to pay for the Work?

$ 33,894

After inserting a number above, then please answer question 13.

COUNT C – SEI'S CLAIM FOR BREACH OF CONTRACT AGAINST MACC

For SEI's Breach of contract claim against MACC as to as to automotive work, engineering work, and/or work to obtain EPA approvals to MACC between April 16, 2011, and September 28, 2011, please answer the following questions:

13. Did SEI establish by the greater weight of the evidence that SEI and MACC agreed to a contract for automotive work, engineering work, and/or work to obtain EPA approvals between April 16, 2011, and September 28, 2011?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 18 and skip the intervening questions, and your verdict is for MACC on the issues of breach of contract as to EPA approvals.

If your answer to this question is "yes," then answer question 14.

14. Did SEI establish by the greater weight of the evidence that MACC breached that contract?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 18 and skip the intervening questions, and your verdict is for MACC on the issues of breach of contract as to the EPA approvals.

If your answer to this question is "yes," then answer question 15.

15. Did SEI establish, with reasonable certainty, that MACC's breach of the contract caused SEI to suffer damages?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 18 and skip the intervening questions, and your verdict is for MACC on the issues of breach of contract as to EPA approvals

If your answer to this question is "yes," then answer question 16.

16. Does the greater weight of the evidence establish the following defenses by MACC to SEI's Breach of contract claim as to EPA approvals?

a. The contract terminated Yes ✓ No ✓

If your answer to this question is "yes," then your verdict is for MACC on the issues of breach of contract as to the contract as to EPA approvals. You should then proceed to question 18 and skip the intervening questions.

If your answer to the above questions is "no," then answer question 17.

17. What is the amount of actual damages that SEI suffered as a result of MACC breaching the contract as to EPA approvals?

$ 100,000

After inserting a number above, then please answer question 18.

COUNT D – JAMES TODD WAGNER'S CLAIM FOR BREACH OF CONTRACT AGAINST WARREN MOSLER AS TO THE $100,000.00 DEPOSIT

For James Todd Wagner's breach contract claim against Warren Mosler as to the $100,000 deposit, please answer the following questions:

18. Did James Todd Wagner prove by the greater weight of the evidence that James Todd Wagner and Warren Mosler entered into a contract whereby Warren Mosler agreed to return the $100.000.00 deposit if MACC's assets were sold to another?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 26 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of breach of contract as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 19.

19. Did James Todd Wagner prove by the greater weight of the evidence that James Todd Wagner did all, or substantially all, of the essential things which the contract required him to do?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 26 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of breach of contract as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 20.

20. Did James Todd Wagner prove by the greater weight of the evidence that that all conditions required by the contract for Warren Mosler's performance had occurred?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 26 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of breach of contract as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 21.

21. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler was required to return the $100,000.00 deposit?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 26 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of breach of contract as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 22.

22. Did James Todd Wagner establish, with reasonable certainty, the amount of damages that Warren Mosler caused James Todd Wagner to suffer?

Yes ✓ No_____

If your answer to this question is "no," then proceed to question 26 and skip the intervening questions.

If your answer to this question is "yes," then answer question 23.

23. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. The $100,000.00 was a non-refundable deposit.

Yes_____ No ✓

b. James Todd Wagner sought return of the $100,000.00 before MACC's assets were sold to another

Yes ✓ No_____

c. There is no contract in writing that the $100,000.00 was a refundable deposit and James Todd Wagner did not perform under that contract.

Yes_____ No✓_____

d. There was no contract for James Todd Wagner to purchase MACC

Yes_____ No✓_____

e. Equitable Estoppel

Yes_____ No✓_____

f. Lew Lee and SFDM was working on behalf James Todd Wagner for the non-refundability of the $100,000.00

Yes_____ No✓_____

g. The $100,000.00 deposit was provided pursuant to a signed, written agreement between MACC and SFDM which made the deposit "non-refundable"

Yes_____ No✓_____

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler on James Todd Wagner's breach of contract claim as to the $100,000 deposit. You should then proceed to question 26 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 24.

24. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler caused James Todd Wagner to suffer damages by Warren Mosler not returning the $100,000.00 deposit?

Yes✓_____ No_____

If your answer to this question is "no," then proceed to question 26 and skip the intervening questions.

If your answer to this question is "yes," then answer question 25.

25. What is the amount of actual damages that James Todd Wagner suffered as a result of Warren Mosler's breach of the contract?

$ 150,000

After inserting a number above, then please answer question 26.

COUNT E – JAMES TODD WAGNER'S CLAIM FOR UNJUST ENRICHMENT AGAINST WARREN MOSLER AS TO THE $100,000.00 DEPOSIT.

For James Todd Wagner's unjust enrichment claim against Warren Mosler as to the $100,000.00 deposit, please answer the following questions:

26. Does the greater weight of the evidence establish that James Todd Wagner conferred a benefit upon Warren Mosler through the $100,000.00 deposit?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 32 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of unjust enrichment as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 27.

27. Does the greater weight of the evidence establish that Warren Mosler knowingly and voluntarily accepted and retained that benefit bestowed by James Todd Wagner?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 32 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of unjust enrichment as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 28.

28. Does the greater weight of the evidence establish that Warren Mosler's retention of the $100,000.00 deposit is inequitable unless Warren Mosler pays $100,000.00 to James Todd Wagner?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 32 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of unjust enrichment as to the $100,000 deposit.

If your answer to this question is "yes," then answer question 29.

29. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. The $100,000.00 was non-refundable

Yes_____ No__✓__

b. James Todd Wagner sought return of the $100,000.00 before MACC's assets were sold to another

Yes__✓__ No_____

c. There was a contract with James Todd Wagner for the $100,000.00 deposit that made the deposit "non-refundable"

Yes_____ No__✓__

d. Equitable Estoppel

Yes_____ No__✓__

e. Lew Lee and SFDM was working on behalf James Todd Wagner for the non-refundability of the $100,000.00

Yes_____ No__✓__

f. The $100,000.00 non-refundable deposit was provided to Warren Mosler pursuant to a signed, written agreement between MACC and SFDM

Yes_____ No__✓__

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler on James Todd Wagner's breach contract claim as to the $100,000 deposit. You should then proceed to question 32 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 30.

30. Did James Todd Wagner establish, with reasonable certainty, the value of the benefit James Todd Wagner conferred?

Yes ✓ No_____

If your answer to this question is "no," then proceed to question 32 and skip the intervening questions.

If your answer to this question is "yes," then answer question 31.

31. What is the value of the benefit that Warren Mosler voluntarily accepted and retained?

$ 100,000

After inserting a number above, then please answer the next question.

COUNT F – JAMES TODD WAGNER'S CLAIM FOR DEFAMATION AGAINST WARREN MOSLER

For James Todd Wagner's defamation claim against Warren Mosler, please answer the following questions:

DEFAMATION CLAIM - STATEMENT 1

The first statement for your consideration is: "the Twin-Turbo conversion to the 'Raptor GTR' Mosler MT900S will not pass emissions and is not certifiable for public sale."

32. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler communicated Defamation Claim - Statement 1 to a third party?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 41 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 1.

If your answer to this question is "yes," then answer question 33.

33. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 1 was false?

Yes ✓ No _____

If your answer to this question is "no," you should then proceed to question 41 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 1.

If your answer to this question is "yes," then answer question 34.

34. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler acted at least negligently concerning James Todd Wagner?

Yes ✓ No _____

If your answer to this question is "no," you should then proceed to question 41 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 1.

If your answer to this question is "yes," then answer question 35.

35. Did James Todd Wagner prove by the greater weight of the evidence that because of the falsity of Defamation Claim - Statement 1, James Todd Wagner suffered actual damages?

Yes ✓ No _____

If your answer to this question is "no," you should then proceed to question 41 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 1.

If your answer to this question is "yes," then answer question 36.

36. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 1 is defamatory?

Yes ✓ No _____

If your answer to this question is "no," you should then proceed to question 41 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 1.

If your answer to this question is "yes," then answer question 37.

37. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. The Defamation Claim – Statement 1 is opinion

Yes_____ No_✓_____

b. The Defamation Claim – Statement 1 is rhetoric and hyperbole

Yes_____ No_✓_____

c. The Defamation Claim - Statement 1 is true or substantially true and made with good motive

Yes_____ No_✓_____

d. Warren Mosler did not make the Defamation Claim – Statement 1 in a negligent manner

Yes_____ No_✓_____

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler. You should then proceed to question 41 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 38.

38. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 1 caused actual damages to James Todd Wagner?

Yes_✓_____ No_____

If your answer to this question is "no," you should then proceed to question 41 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 1.

If your answer to this question is "yes," then answer question 39.

39. Did James Todd Wagner establish, with reasonable certainty, the amount of his damages, that Warren Mosler caused him to suffer by Defamation Claim - Statement 1?

Yes_✓_____ No_error_____

If your answer to this question is "no," then proceed to question 41 and skip the intervening questions.

If your answer to this question is "yes," then answer question 40.

40. What is the amount of damages that James Todd Wagner suffered as a result of Defamation Claim - Statement 1?

$ 250,000

After inserting a number above, please answer question 41.

COUNT F – JAMES TODD WAGNER'S CLAIM FOR DEFAMATION AGAINST WARREN MOSLER

For James Todd Wagner's defamation claim against Warren Mosler, please answer the following questions:

DEFAMATION CLAIM - STATEMENT 2

The second statement for your consideration is "Mosler says the RaptorGTR is not one of its products and refused to comment further."

41. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler communicated Defamation Claim - Statement 2 to a third party?

Yes_____ No_____✓

If your answer to this question is "no," you should then proceed to question 50 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 2.

If your answer to this question is "yes," then answer question 42.

42. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 2 was false?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 50 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 2.

If your answer to this question is "yes," then answer question 43.

43. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler acted at least negligently concerning James Todd Wagner?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 50 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 2.

If your answer to this question is "yes," then answer question 44.

44. Did James Todd Wagner prove by the greater weight of the evidence that because of the falsity of Defamation Claim - Statement 2, James Todd Wagner suffered actual damages?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 50 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 2.

If your answer to this question is "yes," then answer question 45.

45. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 2 is defamatory?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 50 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 2.

If your answer to this question is "yes," then answer question 46.

46. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. The Defamation Claim – Statement 2 is opinion

Yes_____ No_____

b. The Defamation Claim – Statement 2 is rhetoric and hyperbole

Yes_____ No_____

c. The Defamation Claim - Statement 2 is true or substantially true and made with good motive

Yes_____ No_____

d. Warren Mosler did not make the Defamation Claim – Statement 2 in a negligent manner

Yes_____ No_____

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler. You should then proceed to question 50 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 47.

47. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 2 caused actual damages to James Todd Wagner?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 50 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 2.

If your answer to this question is "yes," then answer question 48.

48. Did James Todd Wagner establish, with reasonable certainty, the amount of his damages that Warren Mosler caused him to suffer by Defamation Claim - Statement 2?

Yes_____ No_____

If your answer to this question is "no," then proceed to question 50 and skip the intervening questions.

If your answer to this question is "yes," then answer question 49.

49. What is the amount of damages that James Todd Wagner suffered as a result of Defamation Claim - Statement 2?

$_____

After inserting a number above, please answer question 50.

COUNT F – JAMES TODD WAGNER'S CLAIM FOR DEFAMATION AGAINST WARREN MOSLER

For James Todd Wagner's defamation claim against Warren Mosler, please answer the following questions:

DEFAMATION CLAIM - STATEMENT 3

The third statement for your consideration is "This is not from me. MOSLER is not involved with this. Warren Mosler."

50. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler communicated Defamation Claim - Statement 3 to a third party?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 51.

51. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 3 was false?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 52.

52. Did James Todd Wagner prove by the greater weight of the evidence that Warren Mosler acted at least negligently concerning James Todd Wagner?

Yes X error No ✓

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 53.

53. Did James Todd Wagner prove by the greater weight of the evidence that because of the falsity of Defamation Claim - Statement 3, James Todd Wagner suffered actual damages?

Yes_____ No ✓

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 54.

54. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 3 is defamatory?

Yes_____ No ✓

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 55.

55. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. The Defamation Claim – Statement 3 is opinion
Yes_____ No_____

b. The Defamation Claim – Statement 3 is rhetoric and hyperbole

Yes_____ No_____

c. The Defamation Claim - Statement 3 is true or substantially true and made with good motive

Yes_____ No_____

d. Warren Mosler did not make the Defamation Claim - Statement 3 in a negligent manner

Yes_____ No_____

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler. You should then proceed to question 59 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 56.

56. Did James Todd Wagner prove by the greater weight of the evidence that Defamation Claim - Statement 3 caused actual damages to James Todd Wagner?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 57.

57. Did James Todd Wagner establish, with reasonable certainty, the amount of his damages, that Warren Mosler caused him to suffer by Defamation Claim - Statement 3?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 59 and skip the intervening questions, and your verdict is for Warren Mosler on the issues of Defamation as to Statement 3.

If your answer to this question is "yes," then answer question 58.

58. What is the amount of damages that James Todd Wagner suffered as a result of Defamation Claim - Statement 3?

$_____

After inserting a number above, please answer question 59.

COUNT G – SEI'S TRADE LIBEL CLAIM AGAINST WARREN MOSLER

For SEI's Trade libel claim against Warren Mosler, please answer the following questions:

TRADE LIBEL CLAIM - STATEMENT 1

The first statement for your consideration is: " the Twin-Turbo conversion to the 'Raptor GTR' Mosler MT900S will not pass emissions and is not certifiable for public sale."

59. Did SEI prove by the greater weight of the evidence that Warren Mosler communicated Trade Libel Claim - Statement 1 to a third party?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 67 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 1.

If your answer to this question is "yes," then answer question 60.

60. Did SEI prove by the greater weight of the evidence that Trade Libel Claim - Statement 1 was false?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 67 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 1.

If your answer to this question is "yes," then answer question 61.

61. Did SEI prove by the greater weight of the evidence that Warren Mosler knew or reasonably should know that the Trade Libel Claim - Statement 1 would result in inducing others not to deal with SEI?

Yes ✓ No _____

If your answer to this question is "no," you should then proceed to question 67 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 1.

If your answer to this question is "yes," then answer question 62.

62. Did SEI prove by the greater weight of the evidence that Trade Libel Claim - Statement 1 did play a material and substantial part in inducing others not to deal with SEI?

Yes ✓ No _____

If your answer to this question is "no," you should then proceed to question 67 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 1.

If your answer to this question is "yes," then answer question 63.

63. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. Trade Libel Claim - Statement 1 is opinion

Yes _____ No ✓

b. Trade Libel Claim - Statement 1 is rhetoric and hyperbole

Yes _____ No ✓

c. Trade Libel Claim - Statement 1 is true or substantially true and made with good motive

Yes _____ No ✓

d. Warren Mosler did not make the Trade Libel Claim - Statement 1 in a negligent manner

OK Yes_____ No_____✓

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler on SEI's trade libel claim as to Trade Libel Claim - Statement 1. You should then proceed to question 67 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 64.

64. Did SEI prove by the greater weight of the evidence that Trade Libel Claim - Statement 1 caused actual damages to SEI?

Yes_____✓_____ No_____

If your answer to this question is "no," you should then proceed to question 67 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 1.

If your answer to this question is "yes," then answer question 65.

65. Did SEI establish, with reasonable certainty, the amount of its damages that Warren Mosler caused it to suffer by Trade Libel Claim - Statement 1?

Yes_____✓_____ No_____*error

If your answer to this question is "no," you should then proceed to question 67 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 1.

If your answer to this question is "yes," then answer question 66.

66. What is the amount of damages that SEI suffered as a result of the Trade Libel Claim – Statement 1?

$ 350,000

After inserting a number above, please answer question 67.

COUNT G – SEI'S TRADE LIBEL CLAIM AGAINST WARREN WARREN MOSLER

For SEI's Trade libel claim against Warren Mosler, please answer the following questions:

TRADE LIBEL CLAIM – STATEMENT 2

The second trade libel statement for your consideration is: "Mosler says the RaptorGTR is not one of its products and refused to comment further."

67. Did SEI prove by the greater weight of the evidence that Warren Mosler communicated Trade Libel Claim – Statement 2 to a third party?

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to question 75 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 2.

If your answer to this question is "yes," then answer question 68.

68. Did SEI prove by the greater weight of the evidence that Trade Libel Claim – Statement 2 was false?

Yes__N/A__ No_____

If your answer to this question is "no," you should then proceed to question 75 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 2.

If your answer to this question is "yes," then answer question 69.

69. Did SEI prove by the greater weight of the evidence that Warren Mosler knew or reasonably should know that the Trade Libel Claim – Statement 2 would result in inducing others not to deal with SEI?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 75 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 2.

If your answer to this question is "yes," then answer question 70.

70. Did SEI prove by the greater weight of the evidence that Trade Libel Claim – Statement 2 did play a material and substantial part in inducing others not to deal with SEI?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 75 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 2.

If your answer to this question is "yes," then answer question 71.

71. Does the greater weight of the evidence establish the following defenses by Warren Mosler to SEI's's claim?

a. The Trade Libel Claim – Statement 2 is opinion

Yes_____ No_____

b. The Trade Libel Claim – Statement 2 is rhetoric and hyperbole

Yes_____ No_____

c. The Trade Libel Claim – Statement 2 is true or substantially true and made with good motive

Yes_____ No_____

d. Warren Mosler did not make the Trade Libel Claim – Statement 2 in a negligent manner

Yes_____ No_____

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler on SEI's trade libel claim as to Trade Libel Claim – Statement 2. You should then proceed to question 75 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 72.

72. Did SEI prove by the greater weight of the evidence that Trade Libel Claim – Statement 2 caused actual damages to SEI?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 75 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 2.

If your answer to this question is "yes," then answer question 73.

73. Did SEI establish, with reasonable certainty, the amount of its damages that Warren Mosler caused it to suffer by Trade Libel Claim - Statement 2?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 75 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 2.

If your answer to this question is "yes," then answer question 74.

74. What is the amount of damages that SEI suffered as a result of the Trade Libel Claim – Statement 2?

$_____

After inserting a number above, then please answer question 75.

COUNT G – SEI'S TRADE LIBEL CLAIM AGAINST WARREN MOSLER

For SEI's Trade libel claim against Warren Mosler, please answer the following questions:

TRADE LIBEL - STATEMENT 3

The third statement for your consideration is: "This is not from me. MOSLER is not involved with this. Warren Mosler."

75. Did SEI prove by the greater weight of the evidence that Warren Mosler communicated Statement 3 to a third party?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to question 83 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 3.

If your answer to this question is "yes," then answer question 76.

76. Did SEI prove by the greater weight of the evidence that Statement 3 was false?

Yes_____ No✓_____

If your answer to this question is "no," you should then proceed to question 83 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 3.

If your answer to this question is "yes," then answer question 77.

77. Did SEI prove by the greater weight of the evidence that Warren Mosler knew or reasonably should know that the Statement 3 would result in inducing others not to deal with SEI?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 83 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 3.

If your answer to this question is "yes," then answer question 78.

78. Did SEI prove by the greater weight of the evidence that Statement 3 did play a material and substantial part in inducing others not to deal with SEI?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 83 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 3.

If your answer to this question is "yes," then answer question 79.

79. Does the greater weight of the evidence establish the following defenses by Warren Mosler to James Todd Wagner's claim?

a. Trade Libel Claim - Statement 3 is opinion

Yes_____ No_____

b. Trade Libel Claim - Statement 3 is rhetoric and hyperbole

Yes_____ No_____

c. Trade Libel Claim - Statement 3 is true or substantially true and made with good motive

Yes_____ No_____

d. Warren Mosler did not make the Trade Libel Claim - Statement 3 in a negligent manner

Yes_____ No_____

If your answer to any of the above questions is "yes," then your verdict is for Warren Mosler on SEI's trade libel claim as to Statement 3. You should then proceed to question 83 and skip the intervening questions.

If your answer to all of the above questions is "no," then answer question 80.

80. Did SEI prove by the greater weight of the evidence that Trade Libel Claim - Statement 3 caused actual damages to SEI?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 83 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 3.

If your answer to this question is "yes," then answer question 81.

81. Did SEI establish, with reasonable certainty, the amount of its damages that Warren Mosler caused it to suffer by Trade Libel Claim - Statement 3?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to question 83 and skip the intervening questions, and your verdict is for Warren Mosler on the issue of Trade Libel as to Statement 3.

If your answer to this question is "yes," then answer question 82.

82. What is the amount of damages that SEI suffered as a result of the statement?

$_____

After inserting a number above, then please answer question 83.

WARREN MOSLER AND MACC'S AFFIRMATIVE DEFENSE - RECOUPMENT

For MACC and Warren Mosler's recoupment affirmative defense based on James Todd Wagner and SEI's tortious interference with a business or contractual relationship with Savvas Savopoulos, please answer the following questions:

83. Did MACC and Warren Mosler prove by greater weight of the evidence that a business relationship or contractual relationship existed between Warren Mosler and MACC and Savvas Savopoulos?

Yes_✓_ No_____

If your answer to this question is "no," you should then proceed to question 90 and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of recoupment.

If your answer to this question is "yes," then answer question 84.

84. Did MACC and Warren Mosler prove by greater weight of the evidence that James Todd Wagner and SEI knew that a business relationship or contractual relationship existed between Warren Mosler and MACC and Savvas Savopoulos?

Yes_✓_ No_____

If your answer to this question is "no," you should then proceed to question 90 and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of recoupment.

If your answer to this question is "yes," then answer question 85.

85. Did MACC and Warren Mosler prove by greater weight of the evidence that James Todd Wagner and SEI either intended to induce or otherwise cause the breach of the business relationship or contractual relationship or acted knowing that their actions were likely to cause that result.

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to question 90 and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of recoupment.

If your answer to this question is "yes," then answer question 86.

86. Did MACC and Warren Mosler, by greater weight of the evidence, prove that James Todd Wagner and SEI acted unjustifiably?

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to question 90 and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of recoupment.

If your answer to this question is "yes," then answer question 87.

87. Did MACC and Warren Mosler, by greater weight of the evidence, prove that James Todd Wagner and SEI caused actual damages to MACC and Warren mosler?

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to question 90 and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of recoupment.

If your answer to this question is "yes," then answer question 88.

88. Did MACC and Warren Mosler establish, with reasonable certainty, the amount of damages suffered as a result of James Todd Wagner and SEI's interference?

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to question 90 and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of recoupment.

If your answer to this question is "yes," then answer question 89.

89. What is the amount of damages that Warren Mosler and MACC suffered as a result of James Todd Wagner and SEI's interference?

$\$$_____

After inserting a number above, then answer question 90.

WARREN MOSLER AND MACC'S AFFIRMATIVE DEFENSE - SETOFF

For MACC and Warren Mosler's set off affirmative defense based on James Todd Wagner and SEI's tortious interference with a business or contractual relationship with Savvas Savopoulos, please answer the following questions:

90. Did MACC and Warren Mosler prove by greater weight of the evidence that a business relationship or contractual relationship existed between Warren Mosler and MACC and Savvas Savopoulos?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to signing and date this form and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of setoff.

If your answer to this question is "yes," then answer question 91.

91. Did MACC and Warren Mosler prove by greater weight of the evidence that James Todd Wagner and SEI knew that a business relationship or contractual relationship existed between Warren Mosler and MACC and Savvas Savopoulos?

Yes ✓ No_____

If your answer to this question is "no," you should then proceed to signing and date this form and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of setoff.

If your answer to this question is "yes," then answer question 92.

92. Did MACC and Warren Mosler prove by greater weight of the evidence that James Todd Wagner and SEI either intended to induce or otherwise cause the breach of the business relationship or contractual relationship or acted knowing that their actions were likely to cause that result.

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to signing and date this form and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of setoff.

If your answer to this question is "yes," then answer question 93.

93. Did MACC and Warren Mosler, by greater weight of the evidence, prove that James Todd Wagner and SEI acted unjustifiably?

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to signing and date this form and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of setoff.

If your answer to this question is "yes," then answer question 94.

94. Did MACC and Warren Mosler, by greater weight of the evidence, prove that James Todd Wagner and SEI caused actual damages to MACC and Warren Mosler?

Yes_____ No__✓__

If your answer to this question is "no," you should then proceed to signing and date this form and skip the intervening questions, and your verdict is for James Todd Wagner and SEI on the issues of setoff.

If your answer to this question is "yes," then answer question 95.

95. Did MACC and Warren Mosler establish, with reasonable certainty, the amount of damages suffered as a result of James Todd Wagner and SEI's interference?

Yes_____ No_____

If your answer to this question is "no," you should then proceed to signing and date this form and skip the intervening questions, and

your verdict is for James Todd Wagner and SEI on the issues of setoff.

If your answer to this question is "yes," then answer question 96.

96. What is the amount of damages that Warren Mosler and MACC that will compensate Warren Mosler and MACC as a result of James Todd Wagner and SEI's interference?

$_____

After inserting a number above, please sign and date below.

SO SAY WE ALL, this 26 day of MAY 2023

Foreperson