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

CASE NO.: 502012CA023358XXXXMBAG

		CASE NO. 302012011025550122
	AGNER, SUPERCAI INC., a Flo	R orida
vs.		
CARE CENTER,	SLER, MOSLER AT INC. ("MACC"), a ration, d/b/a M	UTO fosler
ų.		
Defendant	S.	
	<u>VEF</u>	RDICT FORM
COUNT A - SEI'S	CLAIM FOR UNJUS	ST ENRICHMENT AGAINST MACC
work, and/or work to	ust enrichment claim a obtain EPA approvals ver the following ques	against MACC as to automotive work, engineering s to MACC between April 16, 2011, and September stions:
of automo	tive work, engineering	weight of the evidence that SEI conferred the benefit g work, and/or work to obtain EPA approvals to , and September 28, 2011 (the "Work")?
· .	Yes	No
2	question 7 and skip the	s question is "no," you should then proceed to the intervening questions, and your verdict is for s of unjust enrichment.
	If your answer to this	s question is "yes," then answer question 2.
2. Did SEI e voluntaril	stablish by the greater y accepted and retained	weight of the evidence that MACC knowingly and d 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," question 7 and skip the intervening question the issues of unjust enrichments.	estions, and your verdi	eed to ct is for	
		If your answer to this question is "yes,	"then answer question	ı 4.	
4.	Does the SEI's unju	greater weight of the evidence establish ust enrichment claim?	the following defenses	by MACC to	
	a. SEI w	vas paid for the Work	Yes	No	
	b. An ex	press agreement governs the Work	Yes	No	
		vas paid under the Consultant Agreemen MACC	t Yes	No	
		If your answer to any of the above que for MACC on the issues of unjust enri- question 7 and skip the intervening que	chment. You should th	our verdict is en proceed to	
		If your answer to all of the above ques 5.	tions is "no," then answ	wer question	
5.	Did SEI e	establish, with reasonable certainty, the v	value of the Work, SEI	conferred?	
		Yes	No		
		If your answer to this question is "no," the intervening questions.	then proceed to questi	on 7 and skip	
		If your answer to this question is "yes,"	"then answer question	6.	
6.	What is the paid?	ne value of the Work that should in fairn	ess be paid to SEI, if no	ot already	

	\$		_	
	After inserting	a number above, th	en please answer t	he next question.
COUNT B – SEI'S	CLAIM FOR Q	UANTUM MERU	IIT AGAINST MA	ACC
For SEI's Qu work, and/or work to 28, 2011, please ansy	obtain EPA appr		as to automotive wetween April 16, 20	ork, engineering 11, and September
MACC in	n the form of autorovals to MACC b	reater weight of the motive work, engir between April 16, 2	neering work, and/o	provided a benefit to or work to obtain er 28, 2011 (the
	Yes		No	
	question 13 and	to this question is "! I skip the intervening ssues of Quantum I	ng questions, and ye	en proceed to our verdict is for
	If your answer t	to this question is "	yes," then answer of	question 8.
8. Did SEI e circumstan	stablish by the gr nces a reasonable	eater weight of the person would expe	evidence that unde	r ordinary enefit of the Work?
	Yes	 -	No	
	question 13 and	o this question is "r skip the intervenin ssues of Quantum N	g questions, and yo	
	If your answer to	o this question is "y	yes," then answer q	uestion 9.
9. Did SEI es for the Wo		eater weight of the	evidence that MAC	CC failed to pay SEI
	Yes		No	
	question 13 and	o this question is "r skip the intervening ssues of Quantum N	g questions, and yo	

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						
b. An expre	ss agreement governs the Work	Yes	No			
c. SEI was	paid under the Consultant Agreement	Yes	No			
fo	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 1:	your answer to all of the above questions it.	is "no," then ansv	ver question			
	blish, with reasonable certainty, that MAC	C caused it to suf	fer damages?			
Y	es No					
If sk	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					
	fter inserting a number above, then please	answer question	13.			
NT C – SEI'S CLAIM FOR BREACH OF CONTRACT AGAINST MACC						

COU

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		
	question 18 and s	this question is "no kip the intervening sues of breach of cor	questions, and	your verdict is for	E
	If your answer to	this question is "yes	s," then answer	question 14.	
14. Did SEI e contract?		ater weight of the ev	vidence that MA	ACC breached that	t
	Yes		No		
	question 18 and s	this question is "no, kip the intervening on ues of breach of con	questions, and	your verdict is for	
	If your answer to	this question is "yes	s," then answer	question 15.	
	EI to suffer damages	onable certainty, that	t MACC's brea	ch of the contract	
	Yes_		No		
	question 18 and sl	this question is "no, kip the intervening oues of breach of con	questions, and y	your verdict is for	
	If your answer to	this question is "yes	s," then answer	question 16.	
16. Does the g SEI's Brea	greater weight of the ach of contract claim	e evidence establish m as to EPA approv	the following als?		C to
			X W	No. 1	
a. The co	ontract terminated	Yes		NO	

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?					
	\$_/00,000				
	After inserting a number		lease answer question	n 18.	
COUNT D – JAMES AGAINST WARRE	S TODD WAGNER'S N MOSLER AS TO T	CLAIM FOR I HE \$100,000.00	BREACH OF CONT DEPOSIT	TRACT	
For James Too \$100,000 deposit, ple	dd Wagner's breach con ease answer the followir	tract claim againg questions:	nst Warren Mosler as	to the	
Wagner ar	Todd Wagner prove by nd Warren Mosler entere \$100.000.00 deposit if	ed into a contrac	t whereby warren M	osier agreed to	
	Yes	N	lo		
S 8	If your answer to this question 26 and skip the Warren Mosler on the ideposit.	ne intervening qu	uestions, and your ver	dict is for	
	If your answer to this q	question is "yes,"	" then answer questio	n 19.	
19. Did James Wagner di him to do?	Todd Wagner prove by d all, or substantially all	the greater weil, of the essentia	ght of the evidence the lithings which the co	nat James Todd ntract required	
	Yes	N	No		
	If your answer to this question 26 and skip the Warren Mosler on the ideposit.	ne intervening qu	uestions, and your ver	dict is for	
	If your answer to this q	question is "yes,	"then answer questio	n 20.	
20. Did James conditions	Todd Wagner prove by required by the contrac	the greater weight for Warren Mo	ght of the evidence thosler's performance h	at that all ad occurred?	
	Yes	N	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.

	22) 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	The second secon		
21. Did Ja Mosle	nmes Todd Wagner prove by or was required to return the	the greater weight of the \$100,000.00 deposit?	evidence tha	t Warren
	Yes	No		
	guestion 26 and skip th	question is "no," you should ne intervening questions, an issues of breach of contract	nd your verd	ict is for
	If your answer to this o	question is "yes," then answ	ver question	22.
22. Did Ja that W	mes Todd Wagner establish Varren Mosler caused James	n, with reasonable certainty, Todd Wagner to suffer?	, the amount	of damages
	Yes	No		
	If your answer to this c skip the intervening qu	question is "no," then proce estions.	ed to question	on 26 and
	If your answer to this o	question is "yes," then answ	ver question	23.
23. Does t	he greater weight of the evi- r to James Todd Wagner's c	dence establish the following laim?	ng defenses	by Warren
a.	The \$100,000.00 was a not	n-refundable deposit.		,
		Yes	No	<u> </u>
b.	James Todd Wagner sough were sold to another	_		CC's assets
		Vac /	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	es Todd Wagner to purc		126
		Yes	No	/
e.	Equitable Estoppel	Yes	No	/
f.	Lew Lee and SFDM was working refundability of the \$100,000.00			/
		Yes	No	
g.	The \$100,000.00 deposit was pareement between MACC and refundable"	rovided pursuant to a si SFDM which made the	gned, writte e deposit "n	en ion-
		Yes	No	/
	If your answer to any of the for Warren Mosler on James the \$100,000 deposit. You the intervening questions.	s Todd Wagner's breacl	h of contrac	ct claim as to
	If your answer to all of the a 24.	above questions is "no,"	'then answe	er question
Mosler	mes Todd Wagner prove by the great caused James Todd Wagner to sing the \$100,000.00 deposit?	greater weight of the evi suffer damages by Warr	idence that ren Mosler	Warren not
	Yes	No		
(4	If your answer to this questi skip the intervening question		d to questio	n 26 and
	If your answer to this questi-	on is "yes," then answer	r question 2	25.

25. What is the amount of Warren Mosler's brea	f actual damages that James Todd Wagner suffered as a result of ach of the contract?
\$150	0,000
After inser	ting a number above, then please answer question 26.
COUNT E – JAMES TODD W AGAINST WARREN MOSLE	AGNER'S CLAIM FOR UNJUST ENRICHMENT R AS TO THE \$100,000.00 DEPOSIT.
For James Todd Wagner's \$100,000.00 deposit, please answ	s unjust enrichment claim against Warren Mosler as to the ver the following questions:
26. Does the greater weigh a benefit upon Warren	ht of the evidence establish that James Todd Wagner conferred a Mosler through the \$100,000.00 deposit?
Yes	No
question 32	ower to this question is "no," you should then proceed to 2 and skip the intervening questions, and your verdict is for osler on the issues of unjust enrichment as to the \$100,000
If your answ	wer to this question is "yes," then answer question 27.
voluntarily accepted ar	ht of the evidence establish that Warren Mosler knowingly and nd retained that benefit bestowed by James Todd Wagner?
Yes	No
question 32	wer to this question is "no," you should then proceed to 2 and skip the intervening questions, and your verdict is for osler on the issues of unjust enrichment as to the \$100,000
If your answ	wer to this question is "yes," then answer question 28.
28. Does the greater weigh the \$100,000.00 deposi James Todd Wagner?	nt of the evidence establish that Warren Mosler's retention of sit is inequitable unless Warren Mosler pays \$100,000.00 to
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.	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-refun	dable			
			Yes	No	/	
	b.	James Todd Wagner sought retu were sold to another	arn of the \$100,000.00 be	efore MA	CC's assets	
			Yes	No		
	c.	There was a contract with James that made the deposit "non-refur	s Todd Wagner for the \$1 adable"	100,000.0	0 deposit	
			Yes	No		
	d.	Equitable Estoppel	Yes	No	/_	
	e.	Lew Lee and SFDM was working refundability of the \$100,000.00	ng on behalf James Todd	Wagner	for the non-	
			Yes	No	/	
	f.	The \$100,000.00 non-refundable pursuant to a signed, written agree	e deposit was provided to eement between MACC	Warren	Mosler M	

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.

Yes

No

	If your answer to a 30.	ll of the above questions is "no," then answer question				
	30. Did James Todd Wagner establish, with reasonable certainty, the value of the benefit James Todd Wagner conferred?					
	Yes	No				
	If your answer to the skip the intervening	ais question is "no," then proceed to question 32 and g questions.				
	If your answer to th	is question is "yes," then answer question 31.				
31. What is th retained?	e value of the benefi	t that Warren Mosler voluntarily accepted and				
	\$_100,000					
	•	mber above, then please answer the next question.				
WARREN MOSLE	R	'S CLAIM FOR DEFAMATION AGAINST tion claim against Warren Mosler, please answer the				
following questions:		•				
	DEFAMAT	ION CLAIM - STATEMENT 1				
The first state GTR' Mosler MT900	ment for your consider	ION CLAIM - STATEMENT 1 deration is: "the Twin-Turbo conversion to the 'Raptor sions and is not certifiable for public sale."				
GTR' Mosler MT900 32. Did James	ment for your considers will not pass emiss	deration is: "the Twin-Turbo conversion to the 'Raptor				
GTR' Mosler MT900 32. Did James	ment for your considers will not pass emiss	deration is: "the Twin-Turbo conversion to the 'Raptor sions and is not certifiable for public sale." by the greater weight of the evidence that Warren tion Claim - Statement 1 to a third party?				
GTR' Mosler MT900 32. Did James	ment for your considers will not pass emissions. Todd Wagner prove mmunicated Defama Yes If your answer to the question 41 and skip	deration is: "the Twin-Turbo conversion to the 'Raptor sions and is not certifiable for public sale." by the greater weight of the evidence that Warren tion Claim - Statement 1 to a third party?				

	s rodd wag Statement 1	S 1971 S	greater weight of the evidence that Defamation			
	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 an	swer to this ques	tion is "yes," then answer question 34.			
34. Did Jame Mosler ac	cted at least	negligently conc	greater weight of the evidence that Warren erning James Todd Wagner?			
	Yes		No			
	question 4	11 and skip the in	tion is "no," you should then proceed to tervening questions, and your verdict is for es of Defamation as to Statement 1.			
	If your ans	swer to this ques	tion is "yes," then answer question 35.			
35. Did Jame the falsity damages?	of Defama	ner prove by the tion Claim - Stat	greater weight of the evidence that because of ement 1, James Todd Wagner suffered actual			
	Yes	/	No			
	question 4	1 and skip the in	tion is "no," you should then proceed to tervening questions, and your verdict is for es of Defamation as to Statement 1.			
	If your ans	swer to this ques	tion is "yes," then answer question 36.			
36. Did Jame Claim - S	s Todd Wag tatement 1 i	gner prove by the s defamatory?	greater weight of the evidence that Defamation			
	Yes	V	No			
	question 4	1 and skip the in	tion is "no," you should then proceed to tervening questions, and your verdict is for es of Defamation as to Statement 1.			
	If your ans	swer to this quest	tion 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 -	×==	~		
		Yes	No		
b.	The Defamation Claim -	- Statement 1 is rhetoric	and hyperbole		
		Yes	No		
c.	The Defamation Claim - with good motive	Statement 1 is true or s	substantially true and made		
		Yes	No		
d.	Warren Mosler did not n 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 38.	of the above questions i	is "no," then answer question	on	
38. Did Ja Claim	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(Mror)		

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?
\$ <i>250,000</i>
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?

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 Mosler ac	s Todd Wagner prove by the greater weight of the evidence that Warren eted 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 the falsity damages?	s Todd Wagner prove by the greater weight of the evidence that because of of Defamation Claim - Statement 2, James Todd Wagner suffered actual		
	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 Claim - St	s Todd Wagner prove by the greater weight of the evidence that Defamation tatement 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. Th	e Defamation Claim – Statement 2 is opinion		
	Yes No		

b.	he Defamation Claim – Statement 2 is rhetoric and hyperbole		
	Ye	s	No
c.	The Defamation Claim - State with good motive	ement 2 is true or sub	ostantially true and made
	Ye	S	No
d.	Warren Mosler did not make negligent manner	the Defamation Clair	n – Statement 2 in a
	Ye	S	No
47. Did Jan Claim	for Warren Mosler. You intervening questions.	should then proceed to e above questions is " e greater weight of th	"yes," then your verdict is to question 50 and skip the 'no," then answer question the evidence that Defamation I Wagner?
	Yes	No	3
	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 ques	stion is "yes," then an	nswer question 48.
48. Did Jan damage 2?	mes Todd Wagner establish, w es that Warren Mosler caused l	ith reasonable certain him to suffer by Defa	ty, the amount of his mation Claim - Statement
	Yes	No	
	If your answer to this questing the intervening questing		oceed to question 50 and

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 th following questions:	е
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 Defamat Claim - Statement 3 was false?	ion
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?	,
YesNo	
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?	n
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 YesNo	
b. The Defamation Claim – Statement 3 is rhetoric and hyperbole	5

c.	The Defamation C with good motive	Claim - Statement 3 is	s true or substantiall	y true and made
		Yes	No	
d.	Warren Mosler die 3 in a negligent m	d not make the Defan	nation Claim - State	ement
	Yes	No		
	If your answer for Warren Mo intervening qu	to any of the above obsler. You should the estions.	questions is "yes," t en proceed to questi	hen your verdict is on 59 and skip the
	If your answer 56.	to all of the above qu	uestions is "no," the	en answer question
56. Did Jan Claim -	nes Todd Wagner j Statement 3 cause	prove by the greater vertical damages to	weight of the eviden James Todd Wagne	nce that Defamation r?
ଳ	Yes	and the second second	No	
	question 59 and	to this question is "nd skip the intervening on the issues of Def	g questions, and you	r verdict is for
	If your answer	to this question is "y	es," then answer qu	estion 57.
57. Did Jan damage 3?	nes Todd Wagner e s, that Warren Mos	establish, with reason sler caused him to su	able certainty, the a ffer by Defamation	mount of his Claim - Statement
	Yes		No	
	question 59 and	to this question is "n I skip the intervening on the issues of Def	questions, and you	r verdict is for
	If your answer	to this question is "v	es " then answer an	estion 58

Yes___

No_

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 'Rapto 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.

reason	ably should know that the same others not to deal with S	Frade Libel Claim - Sta	atement 1 would result in		
	Yes	No			
	question 67 and skip the	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 SE Statem SEI?	EI prove by the greater weig ent 1 did play a material an	tht of the evidence that ad substantial part in in	t Trade Libel Claim - aducing others not to deal with		
	Yes	No			
	If your answer to this of question 67 and skip the Warren Mosler on the	ne intervening question	ns, and your verdict is for		
	If your answer to this o	question is "yes," then	answer question 63.		
	ne greater weight of the evidence to James Todd Wagner's c		lowing defenses by Warren		
a.	Trade Libel Claim - Staten	nent 1 is opinion Yes	No		
b.	Trade Libel Claim - Staten	nent 1 is rhetoric and h	yperbole		
	,	Yes	No		
c.	Trade Libel Claim - Staten good motive	nent 1 is true or substan	ntially true and made with		
	7	Yes	No		

d.	Warren Mosler did not make the Trade Libel Claim - Statement 1 in a negligent manner
	06 YcsNo
	If your answer to any of the above questions is "yes," then your verdict if 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.
	I prove by the greater weight of the evidence that Trade Libel Claim - ent 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.
	I establish, with reasonable certainty, the amount of its damages that Warren caused it to suffer by Trade Libel Claim - Statement 1?
	Yes_ / No_ Kerror
	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 – Stater	the amount of damages that SEI suffered as a result of the Trade Libel Claim ment 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

TR is not on

The second to the of its produc	rade libel statement for your considera ts and refused to comment further."	tion is: "]	Mosler says the RaptorGT
67. Did SEI p	prove by the greater weight of the evid cated Trade Libel Claim – Statement 2	2 to a thir	d 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 "ye	s," then	answer question 68.
68. Did SEI prove by the greater weight of the evidence that Trade Libel Claim – Statement 2 was false? Yes			
	If your answer to this question is "no question 75 and skip the intervening Warren Mosler on the issue of Trade	question	s, and your verdict is for
	If your answer to this question is "ye	s," then a	answer question 69.
reasonably	rove by the greater weight of the evidence of the strate o	ence that aim – Sta	Warren Mosler knew or tement 2 would result in
	Yes	No	
	If your answer to this question is "no question 75 and skip the intervening Warren Mosler on the issue of Trade	questions	s, and your verdict is for
	If your answer to this question is "ye	s," then a	inswer question 70.

70. Did SI Staten SEI?	EI prove by the greater weight ment 2 did play a material and	nt of the evidence I substantial part	that Trade Libel Claim – in inducing others not to deal with		
	Yes	No			
	question 75 and skip the	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 qu	uestion is "yes," t	hen answer question 71.		
	the greater weight of the evider to SEI's's claim?	ence establish the	e following defenses by Warren		
a.	The Trade Libel Claim - St	atement 2 is opin	ion		
	Yes	1	No		
5					
b.	The Trade Libel Claim – St	atement 2 is rheto	oric and hyperbole		
	Y	'es	No		
c.	The Trade Libel Claim – St with good motive	atement 2 is true	or substantially true and made		
	Y	es	No		
d.	Warren Mosler did not mak negligent manner	e the Trade Libel	Claim – Statement 2 in a		
	Y	es	No		
	for Warren Mosler on S.	EI's trade libel cl	ons is "yes," then your verdict is aim as to Trade Libel Claim – question 75 and skip the		
	If your answer to all of t 72.	he above question	ns is "no," then answer question		

72. Did SE Statem	EI prove by the greent 2 caused actu	eater weight of the everal damages to SEI?	vidence that Trade Libel Claim –	
	Yes		No	
	question 75 a	and skip the intervenion	'no," you should then proceed to ng questions, and your verdict is for ade Libel as to Statement 2.	ė.
	If your answe	er to this question is "	'yes," then answer question 73.	
73. Did SE Mosler	I establish, with r caused it to suffe	reasonable certainty, t er by Trade Libel Clai	the amount of its damages that Waim - Statement 2?	rren
	Yes		No	
	question 75 a	nd skip the intervenir	'no," you should then proceed to ng questions, and your verdict is for de Libel as to Statement 2.	
	If your answe	er to this question is "	yes," then answer question 74.	
	s the amount of dament 2?	amages that SEI suffe	ered as a result of the Trade Libel Cl	aim
	\$		-1	
			en please answer question 75.	
	'S TRADE LIBE		ST WARREN MOSLER	
For SEI's T questions:	Trade libel claim a	against Warren Mosle	er, please answer the following	
	T	RADE LIBEL - STA	ATEMENT 3	
The third st involved with this.	tatement for your Warren Mosler."	consideration is: "Th	is is not from me. MOSLER is not	
		ater weight of the evit 3 to a third party?	idence that Warren Mosler	
	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 question 83 and skip the intervening Warren Mosler on the issue of Trade	question	s, and your verdict is for
	If your answer to this question is "ye	s," 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 question 83 and skip the intervening Warren Mosler on the issue of Trade	question	s, and your verdict is for
	If your answer to this question is "ye	s," then a	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 question 83 and skip the intervening Warren Mosler on the issue of Trade	questions	s, and your verdict is for
	If your answer to this question is "ye	s," then a	nnswer question 79.

79. Does t Mosle	the greater weight of to r to James Todd Wagi	he evidence establi ner's claim?	sh the following defenses by Warren
a.	Trade Libel Claim -	Statement 3 is opin	nion
		Yes	No
b.	Trade Libel Claim -	Statement 3 is rhet	oric and hyperbole
		Yes	No
c.	Trade Libel Claim - good motive	Statement 3 is true	or substantially true and made with
		Yes	No
d.	Warren Mosler did n negligent manner	oot make the Trade	Libel Claim - Statement 3 in a
		Yes	No
	for Warren Mosle	any of the above q er on SEI's trade lil	nuestions is "yes," then your verdict is bel claim as to Statement 3. You and skip the intervening questions.
	for Warren Mosle should then proce	e any of the above quer on SEI's trade liled eed to question 83 a	uestions is "yes," then your verdict is bel claim as to Statement 3. You
	for Warren Mosle should then proce If your answer to 80.	e any of the above quer on SEI's trade libed to question 83 and all of the above quer weight of the evidence.	uestions is "yes," then your verdict is bel claim as to Statement 3. You and skip the intervening questions.
	for Warren Mosle should then proce If your answer to 80.	e any of the above quer on SEI's trade libed to question 83 and all of the above quer weight of the evidamages to SEI?	questions is "yes," then your verdict is bel claim as to Statement 3. You and skip the intervening questions. destions is "no," then answer question
	for Warren Mosle should then process of the should the	any of the above quer on SEI's trade libed to question 83 and all of the above quer weight of the evidamages to SEI? this question is "not kip the intervening and above question is "not kip the above question i	questions is "yes," then your verdict is bel claim as to Statement 3. You and skip the intervening questions. destions is "no," then answer question ence that Trade Libel Claim -

81. Did SEI establish, with reasonable certainty, the amount of its damages that Warre Mosler caused it to suffer by Trade Libel Claim - Statement 3?	en
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 Todo Wagner and SEI's tortious interference with a business or contractual relationship with Savvas Savopoulos, please answer the following questions:	1
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?	đ
YesNo	
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	
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.

Todd Wabusiness	gner and SEI either intended to induction of the contractual relationship or contractual relationship to cause that result.	e or otherwise cause the breach of the p or acted knowing that their actions
8	Yes	No
	If your answer to this question is "requestion 90 and skip the intervening James Todd Wagner and SEI on the	g questions, and your verdict is for
	If your answer to this question is "y	res," then answer question 86.
86. Did MAC Todd Wa	CC and Warren Mosler, by greater we gner and SEI acted unjustifiably?	,
	Yes	No
	If your answer to this question is "n question 90 and skip the intervening James Todd Wagner and SEI on the	g questions, and your verdict is for
	If your answer to this question is "y	es," then answer question 87.
87. Did MAC Todd Wa	CC and Warren Mosler, by greater we gner and SEI caused actual damages t	ight of the evidence, prove that James o MACC and Warren mosler?
	Yes	No
	If your answer to this question is "n question 90 and skip the intervening James Todd Wagner and SEI on the	g questions, and your verdict is for
	If your answer to this question is "y	es," then answer question 88.
88. Did MAC damages	CC and Warren Mosler establish, with suffered as a result of James Todd Wa	reasonable certainty, the amount of agner 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	e amount of damages that Warren Mosler and MACC suffered as a result o
James Tod	d Wagner and SEI's interference?
	•
	Ψ
	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?



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?



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.

Todd Wagner an	d SEI either intended to ship or contractual relati	induce or othe	at of the evidence that James erwise cause the breach of the d knowing that their actions
Yes_		No	✓
	signing and date this f	orm and skip t	o," you should then proceed to the intervening questions, and ther and SEI on the issues of
	If your answer to this	question is "ye	s," then answer question 93.
93. Did MACC and Todd Wagner and	Warren Mosler, by great d SEI acted unjustifiably	7?	ne evidence, prove that James
Yes		No	
	signing and date this for your verdict is for Jam setoff.	orm and skip t les Todd Wagr	," you should then proceed to he intervening questions, and her and SEI on the issues of
	If your answer to this	question is "ye	s," then answer question 94.
94. Did MACC and York Todd Wagner and	Warren Mosler, by great d SEI caused actual dam	ages to MACO	
Yes_	· · · · · · · · · · · · · · · ·	No	
	signing and date this fo	orm and skip tl	," you should then proceed to ne intervening questions, and er and SEI on the issues of
	If your answer to this o	question is "ye	s," then answer question 95.
95. Did MACC and V damages suffered	Warren Mosler establish as a result of James Too	, with reasonal dd Wagner and	ole certainty, the amount of SEI's interference?
Yes		No	
÷	If your answer to this of signing and date this for	question is "no orm and skip th	"you should then proceed to be 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.

Foreperson

96. What is the amount of damages that W Warren Mosler and MACC as a result	Varren Mosler and MACC that will compensate of James Todd Wagner and SEI's interference?
\$	
After inserting a number above, please sign	n and date below.
SO SAY WE ALL, this 26 day of MAY	_2023