

SUPERIOR COURT OF CALIFORNIA

FOR THE COUNTY OF MONTEREY – MONTEREY COURTHOUSE

CARLA GATLIN and SUSAN YBARRA-
TELIAS, Individually and as Successors-In-
Interest of decedent Baylee Ybarra Gatlin,

Plaintiffs,

v.

DO LAB INC.; MULTIDISCIPLINARY
ASSOCIATION FOR PSYCHEDELIC
STUDIES, INC. a.k.a. MAPS, INC.; ZENDO
PROJECT, a business entity form unknown;
RGX MEIDCAL, a business entity form
unknown; RICHARD GOTTLIEB, an
individual; and DOES 1 to 20, inclusive,

Defendants.

) CASE NO. 20CV002753

) **SPECIAL VERDICT**

) Action Filed: May 21, 2018

) Trial Date: October 31, 2022

We answer the questions submitted to us as follows:

1. Sara Gael Giron, Ryan Beauregard and persons responsible for creating and operating M.A.P.S. Zendo Project and the Zendo Project training materials were employees of M.A.P.S. (hereinafter “employees”). Was any one of them negligent?

Y Yes No

If your answer to question 1 is yes, then answer question 2. If you answered no, answer question 4.

2. Was the negligence of employees or any of them a substantial factor in causing the harm to Baylee Ybarra Gatlin?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, answer question 4.

3. Were the Employees, or any of them, acting within the scope of her or his employment when she or he caused harm to Baylee Ybarra Gatlin?

☒ Yes ☐ No

Answer question 4.

4. Plaintiffs CARLA GATLIN and SUSAN YBARRA TELIAS claim Erica Siegal, Cameran Frisbee, Ryan Hoffman, Stephen Bagley, Siri Garfinkel, Tal Garfinkel, and Sasha Friedkin (hereinafter referred to as "Volunteers"), are agents of M.A.P.S.?

Were the Volunteers, or any of them, negligent?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If your answer to question 4 is no, but you answered yes to question 3, answer question 8. If your answer to question 4 is no and you did not answer yes to question 3, stop here, answer no further questions, and have the presiding juror sign and date the form. Notify the bailiff.

5. Was the negligence of any Volunteer a substantial factor in causing the harm to Baylee Ybarra Gatlin?

☐ Yes ☒ No

If your answer to question 5 is yes, answer question 6. If your answer to question 5 is no, but you answered yes to question 3, answer question 8. If your answer to question 5 is no, and you did not answer yes to question 3, stop here, answer no further questions, and have the presiding juror sign and date the form. Notify the bailiff.

6. Was any Volunteer M.A.P.S.' agent?

☐ Yes ☐ No

If your answer to question 6 is yes, answer question 7. If your answer to question 6 is no, but you answered yes to question 3, answer question 8. If your answer to question 6 is no, and you did not answer yes to question 3, stop here, answer no further questions, and have the presiding juror sign and date the form. Notify the bailiff.

7. Was any Volunteer acting within the scope of her agency when she or he caused the harm to Baylee Ybarra Gatlin?

____ Yes ____ No

If your answer to question 7 is yes, answer question 8. If your answer to question 7 is no, but you answered yes to question 3, answer question 8. If your answer to question 7 is no, and you did not answer yes to question 3, stop here, answer no further questions, and have the presiding juror sign and date the form. Notify the bailiff.

8. What are Carla Gatlin's noneconomic damages? Do not reduce the damages based on the fault, if any, of any other person or entity.

a. The loss of Baylee Ybarra Gatlin's love, companionship, comfort, care, assistance, protection, affection, society, counsel and moral support, from May 28, 2017 to the present: \$500,000

b. The loss of Baylee Ybarra Gatlin's love, companionship, comfort, care, assistance, protection, affection, society, counsel and moral support, from today forward: \$1,500,000

TOTAL \$2M_____

9. What are Susan Ybarra-Telias's noneconomic damages? Do not reduce the damages based on the fault, if any, of any other person or entity.

a. The loss of Baylee Ybarra Gatlin's love, companionship, comfort, care, assistance, protection, affection, society, counsel and moral support, from May 28, 2017 to the present: \$500,000

b. The loss of Baylee Ybarra Gatlin's love, companionship, comfort, care, assistance, protection, affection, society, counsel and moral support, from today forward: \$1,500,000

TOTAL \$2M

10. Was Carla Gatlin negligent?

____ Yes Y No

If your answer to question 10 is yes, then answer question 11. If you answered no, insert the number zero next to Carla Gatlin's name in question 18 and answer question 12.

11. Was Carla Gatlin's negligence a substantial factor in causing the harm to Baylee Ybarra Gatlin?

____ Yes 8 No

If your answer to question 11 is yes, then answer question 12. If you answered no, insert the number zero next to Carla Gatlin's name in question 18 and answer question 12.

12. Was Susan Ybarra-Telias negligent?

____ Yes 8 No

If your answer to question 12 is yes, then answer question 13. If you answered no, insert the number zero next to Susan Ybarra-Telias's name in question 18 and answer question 14.

13. Was Susan Ybarra-Telias' negligence a substantial factor in causing harm to Baylee Ybarra Gatlin?

____ Yes ____ No

If your answer to question 13 is yes, then answer question 14. If you answered no, insert the number zero next to Susan Ybarra-Telias's name in question 18 and answer question 14.

14. Was Do Lab, Inc. negligent?

8 Yes ____ No

If your answer to question 14 is yes, then answer question 15. If you answered no, insert the number zero next to Do Lab, Inc.'s name in question 18 and answer question 16.

15. Was Do Lab, Inc.'s negligence a substantial factor in causing harm to Baylee Ybarra Gatlin?

8 Yes ____ No

If your answer to question 15 is yes, then answer question 16. If you answered no, insert the number zero next to Do Lab, Inc.'s name in question 18 and answer question 16.

16. Was Richard Gottlieb dba RGX Medical negligent?

8 Yes ____ No

If your answer to question 16 is yes, then answer question 17. If you answered no, insert the number zero next to Richard Gottlieb dba RGX Medical's name in question 18 and answer question 18.

17. Was Richard Gottlieb dba RGX Medical's negligence a substantial factor in causing harm to Baylee Ybarra Gatlin?

8 Yes ____ No

Answer question 18.

18. What percentage of responsibility for Baylee Ybarra Gatlin's harm do you assign to the following? Insert a percentage for only those who received "yes" answers in questions 3, 7, 11, 13, 15 or 17. The total % cannot exceed 100%:

MAPS: ____ 25%

Carla Gatlin: ____ 0%

Susan Ybarra-Telias: ____ 0%

Do Lab, Inc. ____ 20%

Richard Gottlieb dba RGX Medical: ____ 55%

TOTAL 100 %

Dated: _____

Presiding Juror

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