

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

HILLER, LLC,)	
)	
Plaintiff/Counter-Defendant,)	
)	No. 3:17-cv-743
v.)	
)	
SUCCESS GROUP, INTERNATIONAL)	
LEARNING ALLIANCE and REBECCA CASSEL,)	
)	
Defendants/Counter-Plaintiffs,)	
)	
and)	
)	
CLOCKWORK IP, LLC,)	
)	
Intervenor/Counter-Plaintiff)	

VERDICT FORM

We, the jury, unanimously answer the following questions submitted by the Court as follows:

HILLER’S CLAIM - COPYRIGHT INFRINGEMENT

1. Has Hiller proven by a preponderance of the evidence that it owns a valid copyright with respect to the Technician Guide?

Yes _____ No _____

2. If and only if you answered “Yes” to Question 1: Has Hiller proven by a preponderance of the evidence that SGILA copied protected elements of the Technician Guide as to any of the SGILA Manual Versions?

Yes _____ No _____

3. If and only if you answered “Yes” to Question 1: Has Hiller proven by a preponderance of the evidence that Cassel copied protected elements of the Technician Guide as to any of the SGILA Manual Versions?

Yes _____ No _____

4. If and only if you answered “Yes” to Question 2: Has Hiller proven by a preponderance of the evidence that SGILA committed willful infringement?

Yes _____ No _____

5. If and only if you answered “Yes” to Question 3: Has Hiller proven by a preponderance of the evidence that Cassel committed willful infringement?

Yes _____ No _____

6. Have Defendants proven by a preponderance of the evidence the affirmative defense of joint authorship?

Yes _____ No _____

7. Have Defendants proven by a preponderance of the evidence the affirmative defense of estoppel?

Yes _____ No _____

8. Have Defendants proven by a preponderance of the evidence the affirmative defense of license?

Yes _____ No _____

9. Have Defendants proven by a preponderance of the evidence the affirmative defense of unclean hands?

Yes _____ No _____

10. If and only if you answered “Yes” to Questions 1 and 2, and “No” to Questions 6, 7, 8, and 9, you have returned a verdict for Hiller against SGILA on its copyright infringement claim and you must answer the following question: What amount of damages do you find that Hiller should recover as a result of SGILA’s infringement of Hiller’s copyrighted material?

Amount \$ _____ SGILA’s profits due to copyright infringement.

11. If and only if you answered “Yes” to Questions 1 and 3, and “No” to Questions 6,7, 8, and 9, you have returned a verdict for Hiller against Cassel on its copyright infringement claim and you must answer the following question: What amount of damages do you find that Hiller should recover as a result of Cassel’s infringement of Hiller’s copyrighted material?

Amount \$ _____ Cassel’s profits due to copyright infringement.

CLOCKWORK’S CLAIM – DECLARATORY JUDGMENT OF OWNERSHIP

1. Has Clockwork proven by a preponderance of the evidence that it owns the copyright of the Technician Guide?

Yes _____ No _____

Once completed, sign the verdict form and return it to the Court.

JURY FOREPERSON

Date: