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**FILED**  
 SUPERIOR COURT OF CALIFORNIA  
 COUNTY OF LOS ANGELES

DEC 02 2011

John A. Clark, Executive Officer/Clerk  
 By Glorietta Robinson, Deputy  
 GLORIETTA ROBINSON

8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
 9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10 **DAVID COPPEDGE**, an individual;  
 11  
 12 Plaintiff,

Case No. BC435600

*The Honorable Ernest M. Hiroshige, Dept. 54*

13 vs.

**PLAINTIFF DAVID COPPEDGE'S  
 AMENDED PROPOSED JURY  
 INSTRUCTIONS**

14 **JET PROPULSION LABORATORY**, form  
 15 unknown; **CALIFORNIA INSTITUTE OF**  
 16 **TECHNOLOGY**, form unknown; **GREGO-**  
 17 **RY CHIN**, an Individual; **CLARK A.**  
 18 **BURGESS**, an Individual; **KEVIN KLENK**,  
 19 an Individual; and **Does 1 through 25**, inclu-  
 20 sive,

FSC: December 2, 2011  
 HEARING TIME: 8:30 a.m.  
 DEPT: 54

Trial Date: December 14, 2011

21 Defendants.

22 TO THE COURT, THE DEFENDANT AND COUNSEL:

23 PLAINTIFF DAVID COPPEDGE hereby submits his proposed jury instructions:

Instruction Number	Given As Proposed	Given As Modified	Refused	Withdrawn	Comments
CACI No. 100					Preliminary Admonitions
CACI No. 101					Overview Of Trial

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1	CACI No. 102					Taking Notes During The Trial
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3	CACI No. 103					Multiple Par- ties
4						
5	CACI No. 104					Non Person Party
6						
7	CACI No. 106					Evidence
8						
9	CACI No. 107					Witnesses
10						
11	CACI No. 112					Questions From Jurors
12						
13	CACI No. 113					Bias
14						
15	CACI No. 114					Bench Confer- ences And Conferences In Chambers
16						
17	CACI No. 200					Obligation To Prove —More Likely True Than Not True
18						
19	CACI No. 202					Direct And Indirect Evi- dence
20						
21	CACI No. 206					Evidence Ad- mitted For Limited Pur- pose
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23	CACI No. 208					Deposition As Substantive Evidence
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25	CACI No. 209					Use Of Inter- rogatories Of A Party
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CACI No. 210					Request For Admissions
CACI No. 212					Statements Of A Party Opponent
CACI No. 213					Adoptive Admissions
CACI No. 214					Admissions By Silence
CACI No. 219					Expert Witness Testimony
CACI No. 220					Experts — Questions Containing Assumed Facts
CACI No. 223					Opinion Testimony Of Lay Witness
CACI No. 2430					Wrongful Discharge/Demotion in Violation of Public Policy—Essential Factual Elements
CACI No. 2433					Wrongful Discharge in Violation of Public Policy— Damages
CACI No. 2500					Disparate Treatment — Essential Factual Elements (Gov. Code Section 12940(a))

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	Retaliation (Gov. Code Section 12940(h))																										
	Motivating Reason Ex- plained																										
	Failure To Prevent Har- assment, Dis- crimination, Or Retaliation —Essential Factual Ele- ments — Employer Or Entity Defend- ant (Gov. Code Section 12940(k))																										
	Exemplary Damages; When Allowa- ble; Defini- tions																										
	Vicarious Re- sponsibility - Introduction																										
	Tort Liability Asserted Against Prin- cipal — Essential Fac- tual Elements																										
	Economic And Non Economic Damages																										
	Items Of Eco- nomic Damage																										

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CACI No. 3903C					Past And Future Lost Earnings
CACI No. 3903D					Lost Earning Capacity
CACI No. 3905A					Physical Pain, Mental Suffering, and Emotional Distress (Noneconomic Damage)
CACI No. 5000					Duties Of The Judge And Jury
CACI No. 5002					Evidence
CACI No. 5003					Witnesses
CACI No. 5006					Non Person Party
CACI No. 5009					Pre Deliberation Instructions
CACI No. 5010					Taking Notes During The Trial
CACI No. 5011					Reading Back Of Trial Testimony Injury Room
CACI No. 5012					Introduction To Special Verdict Form

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1	CACI No. 5016				Judge's Com- menting On Evidence
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3	CACI 5018				Audio or Vid- eo Recording and Transcript
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6	Plaintiff's Special In- struction No. 1				Liability for Discrimination Based Upon Perception of Religious Be- lief
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8	Plaintiff's Special In- struction No. 2				Good Cause to Terminate
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10	Plaintiff's Special In- struction No. 3				Factors Con- stituting Ad- verse Em- ployment Ac- tion
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12	Plaintiff's Special In- struction No. 4				Types of Evi- dence Bearing Upon Liability for Retaliation
13					
14	Plaintiff's Special In- struction No. 5				Religious Creed
15					
16	CACI Ver- dict form 2406				Wrongful Dis- charge/Demoti on in Violation of Public Poli- cy
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18	CACI Ver- dict form 2500				Disparate treatment
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CACI Verdict form 2504					Retaliation
CACI Verdict form 2514					Failure To Prevent Harassment, Discrimination, Or Retaliation
CACI Verdict form 3900					Punitive Damages
CACI Verdict form 3901					Punitive Damages Against Employer

DATED: November 29, 2011

**THE BECKER LAW FIRM**

**William J  
Becker Jr, Esq**

Digitally signed by William J Becker Jr,  
Esq  
DN: cn=William J Becker Jr, Esq, o=THE  
BECKER LAW FIRM, ou,  
email=bbeckerlaw@gmail.com, c=US  
Date: 2011.12.01 15:54:36 -08'00'

By:

**WILLIAM J. BECKER, JR., ESQ.**  
Attorneys for Plaintiff, DAVID COPPEDGE