

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CIVIL CASE NO. 1:19-cv-00009-MR

NEXUS TECHNOLOGIES, INC.,)
DANIEL CONTI, and BENJAMIN)
BOMER,)
)
Plaintiffs,)
)
vs.)
)
UNLIMITED POWER, LTD., and)
CHRISTOPHER J. PETRELLA,)
)
Defendants,)
_____)

FILED IN COURT
ASHEVILLE, NC

MAR 15 2021

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

VERDICT SHEET

1. Was Plaintiff Conti an inventor of the device described in the '903 Patent?

YES X NO _____

[If your response to Issue No. 1 is "YES," proceed to Issue No. 2.

If your response to Issue No. 1 is "NO," proceed to Issue No. 3.]

2. Was Plaintiff Conti the sole inventor of the device described in the '903 Patent?

YES X NO _____

[Proceed to Issue No. 3.]

3. Was Plaintiff Conti an inventor of the device described in the '213 Patent?

YES X NO _____

[If your response to Issue No. 3 is "YES," proceed to Issue No. 4.

If your response to Issue No. 3 is "NO," proceed to Issue No. 5.]

4. Was Plaintiff Conti the sole inventor of the device described in the '213 Patent?

YES X NO _____

[Proceed to Issue No. 5]

5. Was Plaintiff Bomer an inventor of the images contained in the '816 Patent?

YES NO

[If your response to Issue No. 5 is "YES," proceed to Issue No. 6.

If your response to Issue No. 5 is "NO," proceed to Issue No. 7.]

6. Was Plaintiff Bomer the sole inventor of the images contained in the '816 Patent?

YES NO

[Proceed to Issue No. 7.]

7. Was Plaintiff Bomer an inventor of the images contained in the '030 Patent?

YES NO

[If your response to Issue No. 7 is "YES," proceed to Issue No. 8.

If your response to Issue No. 7 is "NO," proceed to Issue No. 9.]

8. Was Plaintiff Bomer the sole inventor of the images contained in the '030 Patent?

YES NO

[Proceed to Issue No. 9.]

9. Did Defendants Unlimited Power Ltd. and/or Petrella:

A. Convince Plaintiffs to develop and disclose to Defendants ideas pertaining to an improved portable renewable energy system ("PREPS") under the auspices that Defendants would then hire Plaintiffs and pay them to design and manufacture an improved PREPS for Defendants?

Defendant Unlimited Power Ltd.

YES NO

Defendant Petrella

YES NO

B. Did Defendants Unlimited Power Ltd. and/or Petrella surreptitiously file patent applications embodying Plaintiffs' ideas for an improved PREPS, naming Petrella as the sole inventor?

Defendant Unlimited Power Ltd.

YES NO

Defendant Petrella

YES NO

C. Did Defendants Unlimited Power Ltd. and/or Petrella aid Ravensafe in suing Plaintiffs for infringing the patents?

Defendant Unlimited Power Ltd.

YES X NO _____

Defendant Petrella

YES X NO _____

D. Did Defendants Unlimited Power Ltd. and/or Petrella use the patents as leverage to dissuade potential investors and customers from doing business with Plaintiff Nexus Technologies, Inc.?

Defendant Unlimited Power Ltd.

YES X NO _____

Defendant Petrella

YES X NO _____

[If your response to ANY of Issue No. 9(a), 9(b), 9(c), or 9(d) is "YES" for either Defendant, proceed to Issue No. 10. If your response to all of Issue No. 9(a), 9(b), 9(c), and 9(d) is "NO" for all Defendants, you have completed your deliberations. Have your foreperson sign the Verdict Sheet and return it to the Court.]

10. Was the conduct of Defendants Unlimited Power and/or Petrella you found in answering Issue 9 above engaged in by Defendants Unlimited Power and/or Petrella in commerce or did it affect commerce?

YES

NO

[If your response to Issue No. 10 is "YES," proceed to Issue No.

11. If your response to Issue No. 11 is "NO," you have completed your deliberations. Have your foreperson sign the Verdict Sheet and return it to the Court.]

11. Was such conduct of Defendants Unlimited Power and/or Petrella a proximate cause of any injury to Plaintiffs?

YES

NO

[If your response to Issue No. 11 is "YES," proceed to Issue No.

12. If your response to Issue No. 11 is "NO," you have completed your deliberations. Have your foreperson sign the Verdict Sheet and return it to the Court.]

12. What amount of damages have Plaintiffs sustained as a result of Defendants' conduct?

\$ 10,650,000

You have now completed your deliberations. Have your foreperson sign the Verdict Sheet and return it to the Court.

THIS the 15 day of March 2021.

