

ORIGINAL

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA, *et al.*,
Plaintiffs,
Ex rel.

JAMIE SIEGEL, M.D.,
Plaintiff-Relator,
v.

NOVO NORDISK INC.,
Defendant.

CASE NO. C23-5459 BHS

VERDICT FORM

We, the Jury, answer the Court's questions as follows:

Question 1: Did defendant Novo Nordisk, Inc. violate the federal False Claims Act (FCA) by promoting the off-label use of NovoSeven causing the submission of a false or fraudulent claim for reimbursement to Medicare or Washington Medicaid?

ANSWER:

Yes _____

No X

1 **Question 5:** Did defendant Novo Nordisk, Inc. violate the Washington False
2 Claims Act (WFCA) by promoting the off-label use of NovoSeven causing the
3 submission of a false or fraudulent claim for reimbursement to Washington Medicaid?

4 **ANSWER:**

5 Yes _____ No X

6
7 **Question 6:** Did defendant Novo Nordisk, Inc. violate the Washington Fraudulent
8 Practices Act (WFPA) by falsely or fraudulently paying kickbacks to physicians or
9 patients causing a false or fraudulent claim for reimbursement to Washington Medicaid?

10 **ANSWER:**

11 Yes _____ No X

12
13 *If you answered "Yes" to any of Questions 1, 2, 3, 4, 5, or 6, answer Questions 7a,*
14 *7b, 7c, 7d, and 8.*

15 *If you answered "No" all of Questions 1, 2, 3, 4, 5, and 6, sign and date this*
16 *Verdict Form, and inform the Courtroom Deputy that you have reached a verdict.*

17
18 **Question 7a:** How many total false Medicare claims were submitted?

19 **ANSWER:** _____

20
21 **Question 7b:** How many total false Washington Medicaid claims were submitted?

22 **ANSWER:** _____

1 **Question 7c:** How many individual line item charges for NovoSeven are included
2 in the false Medicare claims?

3 **ANSWER:** _____
4

5 **Question 7d:** How many individual line item charges for NovoSeven are included
6 in the false Washington Medicaid claims?

7 **ANSWER:** _____
8

9 **Question 8:** What amount of damages did the government sustain as a result of
10 defendant's violation(s)? You may not award duplicative damages. For example, you
11 should not count damages incurred from any false claim or individual line item charges
12 for NovoSeven more than once, even if you find that a claim or individual line item
13 charges for NovoSeven violated more than one law.

14 **ANSWER:**

15 \$ _____
16 Damages for Medicare claims

17 \$ _____
18 Damages for Washington Medicaid claims
19
20
21
22

