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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MATTEL INC.,
Plaintiff,
v.
MGA ENTERTAINMENT INC., ET
AL.
Defendant.

Case No: CV 04-09049-DOC (RNBx)
VERDICT FORM - REDACTED

VERDICT FORM

We answer the questions submitted to us as follows:

Mattel's Claim for Declaratory Relief

1. Has Mattel proven that it owns the following:

	<u>Yes</u>	<u>No</u>
Four Sketches: TX 5-39, TX 5-40, TX 5-41, TX 5-42		✓
Pitchbook: TX 1, TX 2, TX 5-102, TX 5-103, TX 5-104, TX 5-105, TX 5-106, TX 5-107, TX 302, TX 323		✓
Notarized Drawings: TX 5-52 (also TX 62-1), 5-54 (also TX 62-2), 5-55 (also TX 62-3), 5-61 (also TX 62-4), 5-62 (also TX 62-5), 5-64 (also TX 62-6), 5-67 (also TX 62-7), 5-68 (also TX 62-8), 5-70 (also TX 62-9), TX 62-10 through 15		✓
Fashion Drawings: TX 1107, TX 1108, TX 1109, TX 1110, TX 5-30, TX 5-51, TX 5-96		✓
Sculptural Head and Body Drawings: TX 5-88, TX 5-89 (also 1129), TX 1327, TX 1328		✓
Formalwear Drawings: TX 5-26, TX 5-27, TX 5-79, TX 5-80, TX 5-81, TX 5-82, TX 5-83, TX 5-84, TX 5-85, TX 5-86, TX 5-87, TX 5-108, TX 10-2		✓
Posterboards: TX 3-1 (also TX 779), TX 3-2, TX 3-3, TX 3-4, TX 3-5 (also TX 791), TX 3-6, TX 3-7, TX 3-8, TX 3-9, TX 3-10, TX 3-11, TX 3-12, TX 3- 13		✓
Line Drawings & Notes: TX 5-38, TX 5-46, TX 5-53, TX 5-56, TX 5-58, TX 5-59, TX 5-60, TX 5-63, TX 5-66, TX 5-72, TX 5-73, TX 777, TX 5-43, TX 5-35, TX 5-36, TX 5-37, TX 5-49, TX 5-50, TX 5-65, TX 5-69		✓
Sculpts: TX 1136A; TX 1141		✓

2. Has Mattel proven that it owns the following:

	<u>Yes</u>	<u>No</u>
The idea for the name "Bratz"		✓
The concept for a multi-ethnic group of hip, urban, edgy, trendy fashion dolls and accessories that are high school friends with attitude, distinctive names, nick names, fashions, personalities, back stories and mascots, as well as teen age girls fashion dolls and accessories, collectively known as "Bratz," including designs for large, oversized heads and feet, large eyes, large lips, and small, almost non-existent noses, and small bodies.		✓

Mattel's Claim for Copyright Infringement

3. Has Mattel proven that the First Generation Cloe doll (TX 12286), the First Generation Sasha Doll (TX 17558), the First Generation Jade Doll (TX 17551), the First Generation Hallidae Doll (TX 17561), the Formal Funk Dana Doll (TX 17529), and/or the Ooh La La Cloe Doll (TX 17540) infringed creative works in which Mattel owns a valid copyright? To determine whether Mattel owns a valid copyright in a particular creative work, refer to your answers to question 1.

Yes _____

No _____

Proceed to Question 4.

4. Has Mattel proven that the First Production Sculpt (TX 17732) and/or the Second Production Sculpt (TX 17733) infringed creative works in which Mattel owns a copyright? To determine whether Mattel owns a valid copyright in a particular creative work, refer to your answers to question 1.

Yes _____

No _____

If you answered "no" to questions 3 and 4, stop and proceed to Question 7.

If you answered "yes" to either question 3 or question 4, proceed to complete the Chart in Question 5.

Do not Answer

Below is a chart that identifies each allegedly infringing product

Identify:

- (1) the specific creative works that the product infringes (identify the creative works by writing in their corresponding exhibit numbers into column 1)
- (2) whether MGA Entertainment, Inc. is liable for that product's infringement (in column 2);
- (3) whether Isaac Larian is liable for that product's infringement (in column 3);
- (4) whether MGA Entertainment (Hong Kong) Limited is liable for that product's infringement (in column 4);
- (5) the amount of damages, if any, owed to Mattel by MGA Entertainment, Inc. for that product's infringement (in column 5);
- (6) the amount of damages, if any, owed to Mattel by MGA Entertainment (Hong Kong) Limited for that product's infringement (in column 6);
- (7) the amount of damages, if any, owed to Mattel by Isaac Larian for that product's infringement (in column 7);
- (8) The total amount of damages, if any, owed to Mattel for that product's infringement (in column 8);

	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
Product	<u>Creative Work(s) Infringed by Product</u>	<u>MGAE liable?</u>	<u>MGA HK Liable?</u>	<u>Larian liable?</u>	<u>MGAE Damages</u>	<u>Larian Damages</u>	<u>MGA HK Damages</u>	<u>Total Damages</u>
First Generation Cloe doll (TX 12286)								
First Generation Sasha Doll (TX 17558)								
First Generation Jade Doll (TX 17551)								
First Generation Hallidae <i>Yasmin</i> Doll (TX 17561)								

Formal Funk Dana Doll (TX 17529)								
Ooh La La Cloe Doll (TX 17540)								
First Production Sculpt (TX 17732)								
Second Production Sculpt (TX 17733)								

6. On or before the following dates, did Mattel discover, or should it have discovered through the exercise of reasonable diligence, the claimed copyright infringement by MGA Entertainment, Inc., MGA Entertainment (Hong Kong) Ltd., or Isaac Larian?

DONOT DISCUSS

Complete each box with the answers "yes" or "no" in response to this question.

Once you make a choice and answer "yes" to any date, then all later dates as to that defendant must be marked "yes."

Once you make a choice and answer "no" as to any date, then all prior dates as to that defendant must be marked "no."

	April 27, 2001	April 13, 2002	November 23, 2002	November 20, 2003
MGA Entertainment, Inc.				
MGA Entertainment (HK) Ltd.				
Isaac Larian				

Mattel's Claim for Trade Secret Misappropriation

7. Has Mattel proven that any of the items listed in the chart in Question 9 are its trade secrets?

Yes No

If no, stop here and go to Question 14.

If yes, proceed to Question 8.

8. Has Mattel proven that MGA Entertainment, Inc. and/or Isaac Larian misappropriated any of the listed items that qualify as trade secrets in the chart in Question 9?

Yes No

If no, stop here and go to Question 14.

If yes, proceed to complete the Chart in Question 9.

9. Below is a chart that lists Mattel's claimed trade secrets.

Identify:

- (1) whether Mattel has proven each entry is a trade secret (answer "YES" or "NO" in column 1).
- (2) whether Mattel has proven that MGA Entertainment, Inc. misappropriated the claimed trade secret (answer "YES" or "NO" in column 2);
- (3) whether Mattel has proven that Isaac Larian misappropriated the claimed trade secret (answer "YES" or "NO" in column 3);
- (4) the amount of damages, if any, that Mattel is owed from MGA Entertainment, Inc. for the misappropriation of the claimed trade secret (in column 4);
- (5) the amount of damages, if any, that Mattel is owed from Isaac Larian for the misappropriation of the claimed trade secret (in column 5); and
- (6) the total damages, if any, owed to Mattel for the misappropriation of the claimed trade secret (in column 6).

		1	2	3	4	5	6
#	Description	Mattel's Trade Secret?	Did MGA Misappropriate ?	Did Larian Misappropriate?	Damages Against MGA	Damages against Larian	Total Damages owed to Mattel
1.	A multi-ethnic group of hip, urban, edgy, trendy teen age girls fashion dolls and accessories, collectively known as "Bratz," including designs for large, oversized heads and feet, large eyes, large lips, and small, almost non-existent noses, and small bodies. The dolls are four high school, multi-ethnic friends with attitude; each have distinctive names, nick names, fashions, personalities, back stories and icons descriptive of the doll's personal mascot.	NO	NO	NO	NO	NO	NO
2.	The name "Bratz" used in connection with a multi-ethnic group of hip, urban, edgy, trendy teen age girls fashion dolls and accessories, collectively known as	NO	NO	NO	NO	NO	NO

		1	2	3	4	5	6	
#	Description	Mattel's Trade Secret?	Did MGA Misappropriate ?	Did Larian Misappropriate?	Damages Against MGA	Damages against Larian	Total Damages owed to Mattel	
	"Bratz," including designs for large, oversized heads and feet, large eyes, large lips, and small, almost non-existing noses, and small bodies. The dolls are four high school, multi-ethnic friends with attitude; each have distinctive names, nick names, fashions, personalities, back stories and icons descriptive of the doll's personal mascot.		<i>see previous page</i>					
3.	Sculpt TX 1136A	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>0</i>	<i>0</i>	<i>zero</i>	
4.	Sculpt TX 1141	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>0</i>	<i>0</i>	<i>zero</i>	
5.	Bratz Hero Shot, TX 302B-0001	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>0</i>	<i>0</i>	<i>zero</i>	
6.	The following Bratz drawings: TXs 1, 2, 3, 5-26, 5-27, 5-79, 5-81, 5-82, 5-83, 5-84, 5-30, 5-52, 62, 5-88, 5-35, 5-36, 5-37, 5-38, 5-39, 5-40, 5-41, 5-42, 5-43, 5-46, 5-49, 5-50, 5-53, 5-54, 5-55, 5-56, 777, 5-58, 5-59, 5-60, 5-61, 5-62, 5-63, 5-64, 5-65, 5-66, 5-67, 5-68, 5-73, 5-72, 5-70, 5-69, 779, 5-107, 5-106, 5-103, 5-104, 791, 5-108, 5-85, 719, 10-2, 5-80, 5-86, 5-87, 5-89 (also 1129), 10-3, 5-102, 5-105, 1107, 1108, 1109, 1110, 1327, 1328, 5-96, 302, 323-4 through 323-35							
7.	Barbie 2005 Preliminary Line List: TX 7104	<i>yes</i>	<i>NO</i>	<i>NO</i>	<i>0</i>	<i>0</i>	<i>zero</i>	
8.	Viability Testing Report: TX 6739	<i>yes</i>	<i>NO</i>	<i>NO</i>	<i>0</i>	<i>0</i>	<i>zero</i>	

		1	2	3	4	5	6
#	Description	Mattel's Trade Secret?	Did MGA Misappropriate ?	Did Larian Misappropriate?	Damages Against MGA	Damages against Larian	Total Damages owed to Mattel
9.	International Overview Strategic Plan Meetings Document: TX 24033	YES	NO	NO	0	0	zero
10.	Forecasting and Inventory Management Documents: TX 7168	NO	NO	NO	0	0	zero
11.	Forecasting and Inventory Management Documents: 7169	NO	NO	NO	0	0	zero
12.	Forecasting and Inventory Management Documents: TX 7170	NO	NO	NO	0	0	zero
13.	Forecasting and Inventory Management Documents: TX 7171	NO	NO	NO	0	0	zero
14.	Forecasting and Inventory Management Documents: TX 7172	NO	NO	NO	0	0	zero
15.	Forecasting and Inventory Management Documents: TX 7173	NO	NO	NO	0	0	zero
16.	Forecasting and Inventory Management Documents: TX 7174	NO	NO	NO	0	0	zero
17.	Forecasting and Inventory Management Documents: TX 7175	NO	NO	NO	0	0	zero
18.	Forecasting and Inventory Management Documents: TX 7176	NO	NO	NO	0	0	zero
19.	Forecasting and Inventory Management Documents: TX 7177A	NO	NO	NO	0	0	zero
20.	Forecasting and Inventory Management Documents: TX 7178	NO	NO	NO	0	0	zero
21.	Forecasting and Inventory Management Documents: TX 7179	NO	NO	NO	0	0	zero
22.	Forecasting and Inventory Management Documents: TX 7180	NO	NO	NO	0	0	zero
23.	Forecasting and Inventory Management	see next page					

		1	2	3	4	5	6
#	Description	Mattel's Trade Secret?	Did MGA Misappropriate ?	Did Larian Misappropriate?	Damages Against MGA	Damages against Larian	Total Damages owed to Mattel
	Documents: TX 7181	NO	NO	NO	0	0	zero
24.	Forecasting and Inventory Management Documents: TX 7182	NO	NO	NO	0	0	zero
25.	Forecasting and Inventory Management Documents: TX 7183	NO	NO	NO	0	0	zero
26.	Forecasting and Inventory Management Documents: TX 7184	NO	NO	NO	0	0	zero
27.	Forecasting and Inventory Management Documents: TX 7185	NO	NO	NO	0	0	zero
28.	Forecasting and Inventory Management Documents: TX 7186	NO	NO	NO	0	0	zero
29.	Forecasting and Inventory Management Documents: TX 7187	NO	NO	NO	0	0	zero
30.	Forecasting and Inventory Management Documents: TX 7188	NO	NO	NO	0	0	zero
31.	Forecasting and Inventory Management Documents: TX 7189	NO	NO	NO	0	0	zero
32.	Forecasting and Inventory Management Documents: TX 7191	NO	NO	NO	0	0	zero
33.	Forecasting and Inventory Management Documents: TX 7192	NO	NO	NO	0	0	zero
34.	Forecasting and Inventory Management Documents: TX 7193	NO	NO	NO	0	0	zero
35.	Forecasting and Inventory Management Documents: TX 7194	NO	NO	NO	0	0	zero
36.	Forecasting and Inventory Management Documents: TX 7195	NO	NO	NO	0	0	zero
37.	Forecasting and Inventory Management Documents: TX 7197	NO	NO	NO	0	0	zero

		1	2	3	4	5	6
#	Description	Mattel's Trade Secret?	Did MGA Misappropriate ?	Did Larian Misappropriate?	Damages Against MGA	Damages against Larian	Total Damages owed to Mattel
38.	Forecasting and Inventory Management Documents: TX 7203	Yes	NO	NO	0	0	ZERO
39.	Forecasting and Inventory Management Documents: TX 7204	NO	NO	NO	0	0	ZERO
40.	Forecasting and Inventory Management Documents: TX 7207	Yes	NO	NO	0	0	ZERO
41.	Forecasting and Inventory Management Documents: TX 7210	Yes	NO	NO	0	0	ZERO
42.	Forecasting and Inventory Management Documents: TX 7211	Yes	NO	NO	0	0	ZERO
43.	Forecasting and Inventory Management Documents: TX 7212	Yes	NO	NO	0	0	ZERO
44.	Forecasting and Inventory Management Documents: TX 7218	Yes	NO	NO	0	0	ZERO
45.	Forecasting and Inventory Management Documents: TX 7219	Yes	NO	NO	0	0	ZERO
46.	Forecasting and Inventory Management Documents: TX 7220	Yes	NO	NO	0	0	ZERO
47.	Forecasting and Inventory Management Documents: TX 7222	NO	NO	NO	0	0	ZERO
48.	Forecasting and Inventory Management Documents: TX 7223	NO	NO	NO	0	0	ZERO
49.	Forecasting and Inventory Management Documents: TX 7224	Yes	NO	NO	0	0	ZERO
50.	Forecasting and Inventory Management Documents: TX 7225	Yes	NO	NO	0	0	ZERO
51.	Forecasting and Inventory Management Documents: TX 7226	NO	NO	NO	0	0	ZERO
52.	Forecasting and Inventory Management	see next page					

#	Description	1 Mattel's Trade Secret?	2 Did MGA Misappropriate ?	3 Did Larian Misappropri- ate?	4 Damages Against MGA	5 Damages against Larian	6 Total Damages owed to Mattel
	Documents: TX 7228	NO	NO	NO	0	0	ZERO
53.	Forecasting and Inventory Management Documents: TX 7230	NO	NO	NO	0	0	ZERO
54.	Forecasting and Inventory Management Documents: TX 7232	NO	NO	NO	0	0	ZERO
55.	Forecasting and Inventory Management Documents: TX 7233	NO	NO	NO	0	0	ZERO
56.	Forecasting and Inventory Management Documents: TX 7234	NO	NO	NO	0	0	ZERO
57.	Forecasting and Inventory Management Documents: TX 7236	NO	NO	NO	0	0	ZERO
58.	Forecasting and Inventory Management Documents: TX 7237	NO	NO	NO	0	0	ZERO
59.	Forecasting and Inventory Management Documents: TX 7239	NO	NO	NO	0	0	ZERO
60.	Forecasting and Inventory Management Documents: TX 7240	NO	NO	NO	0	0	ZERO
61.	Forecasting and Inventory Management Documents: TX 7241	NO	NO	NO	0	0	ZERO
62.	Forecasting and Inventory Management Documents: TX 7242	NO	NO	NO	0	0	ZERO
63.	Forecasting and Inventory Management Documents: TX 7243	NO	NO	NO	0	0	ZERO
64.	Forecasting and Inventory Management Documents: TX 7245	NO	NO	NO	0	0	ZERO
65.	Forecasting and Inventory Management Documents: TX 7246	NO	NO	NO	0	0	ZERO
66.	Forecasting and Inventory Management Documents: TX 7247	NO	NO	NO	0	0	ZERO

		1	2	3	4	5	6
#	Description	Mattel's Trade Secret?	Did MGA Misappropriate ?	Did Larian Misappropriate?	Damages Against MGA	Damages against Larian	Total Damages owed to Mattel
67.	Forecasting and Inventory Management Documents: TX 7248	NO	NO	NO	\$	\$	ZERO
68.	Forecasting and Inventory Management Documents: TX 7249	NO	NO	NO	\$	\$	ZERO
69.	Forecasting and Inventory Management Documents: TX 7252	NO	NO	NO	\$	\$	ZERO
70.	Forecasting and Inventory Management Documents: TX 7253	NO	NO	NO	\$	\$	ZERO
71.	Forecasting and Inventory Management Documents: TX 7254	NO	NO	NO	\$	\$	ZERO
72.	Forecasting and Inventory Management Documents:: TX 7255	NO	NO	NO	\$	\$	ZERO
73.	Forecasting and Inventory Management Documents:: TX 7256	NO	NO	NO	\$	\$	ZERO
74.	Forecasting and Inventory Management Documents: TX 7258	NO	NO	NO	\$	\$	ZERO
75.	Forecasting and Inventory Management Documents: TX 20474	NO	NO	NO	\$	\$	ZERO
76.	Forecasting and Inventory Management Documents: TX 23696	NO	NO	NO	\$	\$	ZERO
77.	Forecasting and Inventory Management Documents: TX 23697	NO	NO	NO	\$	\$	ZERO
78.	Forecasting and Inventory Management Documents: TX 23698	NO	NO	NO	\$	\$	ZERO
79.	Forecasting and Inventory Management Documents: TX 23699	NO	NO	NO	\$	\$	ZERO
80.	Forecasting and Inventory Management Documents: TX 26939	NO	NO	NO	\$	\$	ZERO

10. What is the total amount owed to Mattel, if any, on its claim for trade secret misappropriation?

MGA Entertainment, Inc. \$ ZERO (total of all amounts in column 4)

Isaac Larian \$ ZERO (total of all amounts in column 5)

Total amount owed to Mattel \$ ZERO (total of all amounts in column 6)

11. On or before the following dates, did Mattel discover, or should it have discovered through the exercise of reasonable diligence, facts that would have caused a reasonable person to suspect that MGA Entertainment, Inc. or Isaac Larian had misappropriated any Bratz-related concepts and works?

Complete each box with the answers "yes" or "no" in response to this question.

Once you make a choice and answer "yes" to any date, then all later dates as to that defendant must be marked "yes."

Once you make a choice and answer "no" as to any date, then all prior dates as to that defendant must be marked "no."

	<u>April 27, 2001</u>	<u>April 13, 2002</u>	<u>November 23, 2002</u>	<u>November 20, 2003</u>
MGA Entertainment, Inc.	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Isaac Larian	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>

12. Has Mattel proven that MGA Entertainment, Inc. or Isaac Larian used improper means to acquire any of the following claimed trade secrets? (answer "YES" or "NO" in each box)

	<u>MGA Entertainment, Inc.</u>	<u>Isaac Larian</u>
A multi-ethnic group of hip, urban, edgy, trendy teen age girls fashion dolls and accessories, collectively known as "Bratz," including designs for large, oversized heads and feet, large eyes, large lips, and small, almost non-existent noses, and small bodies. The dolls are four high school, multi-ethnic friends with attitude; each have distinctive names, nick names, fashions, personalities, back stories and icons descriptive of the doll's personal mascot.	NO	NO
The name "Bratz" used in connection with a multi-ethnic group of hip, urban, edgy, trendy teen age girls fashion dolls and accessories, collectively known as "Bratz," including designs for large, oversized heads and feet, large eyes, large lips, and small, almost non-existing noses, and small bodies. The dolls are four high school, multi-ethnic friends with attitude; each have distinctive names, nick names, fashions, personalities, back stories and icons descriptive of the doll's personal mascot.	NO	NO
Sculpt TX 1136A	NO	NO
Sculpt TX 1141	NO	NO
Bratz Hero Shot, TX 302B-0001	NO	NO
The following Bratz drawings: TXs 1, 2, 3, 5-26, 5-27, 5-79, 5-81, 5-82, 5-83, 5-84, 5-30, 5-52, 62, 5-88, 5-35, 5-36, 5-37, 5-38, 5-39, 5-40, 5-41, 5-42, 5-43, 5-46, 5-49, 5-50, 5-53, 5-54, 5-55, 5-56, 777, 5-58, 5-59, 5-60, 5-61, 5-62, 5-63, 5-64, 5-65, 5-66, 5-67, 5-68, 5-73, 5-72, 5-70, 5-69, 779, 5-107, 5-106, 5-103, 5-104, 791, 5-108, 5-85, 719, 10-2, 5-80, 5-86, 5-87, 5-89 (also 1129), 10-3, 5-102, 5-105, 1107, 1108, 1109, 1110, 1327, 1328, 5-96, 302, 323-4 through 323-35	NO	NO

13. Has Mattel proven by clear and convincing evidence that MGA Entertainment, Inc. and/or Isaac Larian acted willfully and maliciously in the misappropriation of any trade secrets?

	<u>Yes</u>	<u>No</u>
MGA Entertainment, Inc.		✓
Isaac Larian		✓

MGA's Claim for Trade Secret Misappropriation

14. Has MGA Entertainment, Inc. proven that any of the items listed in the chart in question 16 are its trade secrets?

Yes

No

If no, stop here and go to Question 20.

If yes, proceed to Question 15.

15. Has MGA Entertainment, Inc. proven that Mattel, Inc. misappropriated any of listed items that qualify as trade secrets in the chart in Question 16?

Yes

No

If no, stop here and go to Question 20.

If yes, proceed to complete the chart in Question 16.

16. Below is a chart that lists MGA Entertainment, Inc.'s claimed trade secrets.

Identify:

- (1) whether MGA Entertainment, Inc. has proven each entry is a trade secret (answer "YES" or "NO" in column 1).
- (2) whether MGA Entertainment, Inc. has proven that Mattel, Inc. misappropriated the claimed trade secret (answer "YES" or "NO" in column 2);
- (3) whether MGA Entertainment, Inc. has proven that Mattel, Inc. used improper means to acquire the claimed trade secrets (answer "YES" or "NO" in column 3);
- (4) the amount of damages, if any, that MGA Entertainment, Inc. is owed from Mattel, Inc. for the misappropriation of the claimed trade secret (in column 4).

#	Description	1 <u>Trade Secret?</u>	2 <u>Did Mattel Misappropriate?</u>	3 <u>Improper Means?</u>	4 <u>Total Damages owed to MGA Entertainment, Inc.</u>
1.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz Mobile	YES	YES	YES	\$3.4 MILLION
2.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz Styl' It Collection	YES	YES	YES	\$3.4 MIL
3.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Boys	NO	NO	NO	0
4.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz WinterWonderland Collection	YES	YES	YES	\$3.4 MIL
5.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz Formal Funk Collection	YES	YES	YES	\$3.4 MIL
6.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz Runway Formal Funk Collection	YES	YES	YES	\$3.4 MIL
7.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz FM Limo	YES	YES	YES	\$3.4 MIL

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
8.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz Motorcycle	YES	YES	YES	\$ 3.4 MIL
9.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bratz Pet Assortment	YES	YES	YES	\$ 3.4 MIL
10.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz City Playsets	NO	NO	NO	\$
11.	The appearance, operation, intended play pattern, and plans to advertise on television for Lil' Bratz Slumber Party	NO	NO	NO	\$
12.	The appearance, operation, intended play pattern, and plans to advertise on television for Lil' Bratz Spring Break	NO	NO	NO	\$
13.	The appearance, operation, intended play pattern, and plans to advertise on television for Lil' Bratz Loungin' Loft	NO	NO	NO	\$
14.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Lil' Bratz Vehicle Assortment	YES	YES	YES	\$ 3.4 MIL
15.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Lil' Bratz Deluxe Mall Playset	YES	YES	YES	\$ 3.4 MIL
16.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Petz	YES	YES	YES	\$ 3.4 MIL
17.	The appearance, operation, intended play pattern, and plans to advertise on television for Lil' Bratz Dance Party	NO	NO	NO	\$
18.	The appearance, operation, intended play pattern, and plans to advertise on television for Dazzlin' Disco Café	YES	YES	YES	\$ 3.4 MIL
19.	The appearance, operation, intended play pattern, and	YES	YES	YES	\$ 3.4 MIL

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
	plans to advertise on television for Sun Kissed Summer				
20.	The appearance, operation, intended play pattern, and plans to advertise on television for Girls Nite Out	YES	YES	YES	\$ 3.4 MIL
21.	The appearance, operation, intended play pattern, and plans to advertise on television for Wild Life Safari Collection	YES	YES	YES	\$ 3.4 MIL
22.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Diamondz	YES	YES	YES	\$ 3.4 MIL
23.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Sportz	NO	NO	NO	Ø
24.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Virtual Buddiez Petz	YES	YES	YES	\$ 3.4 MIL
25.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Live In Concert	NO	NO	NO	Ø
26.	The appearance, operation, intended play pattern, and plans to advertise on television for Midnite Dance	NO	NO	NO	Ø
27.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Campfire	YES	YES	YES	\$ 3.4 MIL
28.	The appearance, operation, intended play pattern, and plans to advertise on television for Wild Wild West	YES	YES	YES	\$ 3.4 MIL
29.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Rock Angels	YES	YES	YES	\$ 3.4 MIL
30.	The appearance, operation, intended play pattern, and plans to advertise on television for Holiday 2005	NO	NO	NO	Ø
31.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz phone	NO	NO	NO	Ø
32.	The appearance, operation, intended play pattern, and plans to advertise on television for Funk Fashion	NO	NO	NO	Ø

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
	Makeover game (see prior page)				
33.	The appearance, operation, intended play pattern, and plans to advertise on television for Hopscotch Heather	NO	NO	NO	0
34.	The appearance, operation, intended play pattern, and plans to advertise on television for Dream Baby	NO	NO	NO	0
35.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz	NO	NO	NO	0
36.	The appearance, operation, intended play pattern, and plans to advertise on television for Jumpin Jenny	NO	NO	NO	0
37.	The appearance, operation, intended play pattern, and plans to advertise on television for Scooter Samantha	NO	NO	NO	0
38.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Hello Kitty Be Beautiful Matchmaker Journal and Virtual Crush	NO	NO	NO	0
39.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for iCandy	NO	NO	NO	0
40.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Liar Liar	YES	NO	NO	0
41.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Monkey See Monkey Do	YES	YES	YES	\$ 3.4 mil
42.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for A New Breed and Palm Puppies	YES	NO	NO	0
43.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Hello Kitty Scooter	YES	NO	NO	0
44.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Insecto Bots	YES	NO	NO	0

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
45.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Monster Surgery	Yes	NO	NO	0
46.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for My Beautiful Mermaid	Yes	NO	NO	0
47.	The appearance, operation, intended play pattern, and plans to advertise on television for Hulk Two-Way Radios	NO	NO	NO	0
48.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Musikids	Yes	NO	NO	0
49.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Lil' Bratz Boyz	Yes	Yes	Yes	\$3.4 mil
50.	The appearance, operation, intended play pattern, and plans to advertise on television for My Beautiful Ballerina	NO	NO	NO	0
51.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Pia Back to School	Yes	NO	NO	0
52.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Jumpin' on the Bed Bouncin' Baby	Yes	NO	NO	0
53.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Rachel Lul A Bye Baby	Yes	NO	NO	0
54.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for RC Street Flyer Samantha	Yes	NO	NO	0
55.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Walk 'n Go	Yes	NO	NO	0

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
	Jo Jo (see prior page)				
56.	The appearance, operation, intended play pattern, plans to advertise on television, and FOB pricing for Bead Palace	YES	NO	NO	0
57.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Stylin' Dance Party	NO	NO	NO	0
58.	The appearance, operation, intended play pattern, and plans to advertise on television for Alien Racers	YES	YES	YES	\$3.4 mil
59.	The appearance, operation, intended play pattern, and plans to advertise on television for Micro Blast Jet Skis	NO	NO	NO	0
60.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Luscious Lamp/Alarm Clocks	NO	NO	NO	0
61.	The appearance, operation, intended play pattern, and plans to advertise on television for Flower Fairies	NO	NO	NO	0
62.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Internet Café Playset	NO	NO	NO	0
63.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Retro Café	NO	NO	NO	0
64.	The appearance, operation, intended play pattern, and plans to advertise on television for Lil' Bratz Transforming Bedroom	NO	NO	NO	0
65.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Girls Nite Out	YES	YES	YES	\$3.4 mil
66.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Kidz	YES	YES	YES	\$3.4 mil
67.	The appearance, operation, intended play pattern, and plans to advertise on television for High School Cool	NO	NO	NO	0

#	Description	1 <u>Trade Secret?</u>	2 <u>Did Mattel Misappropriate?</u>	3 <u>Improper Means?</u>	4 <u>Total Damages owed to MGA Entertainment, Inc.</u>
68.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Rodeo	NO	NO	NO	0
69.	The appearance, operation, intended play pattern, and plans to advertise on television for Passion for Fashion	YES	YES	YES	\$3.4 mil
70.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Baby Sisterz	NO	NO	NO	0
71.	The appearance, operation, intended play pattern, and plans to advertise on television for Talking Bratz	NO	NO	NO	0
72.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Costume	NO	NO	NO	0
73.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz on Ice	NO	NO	NO	0
74.	The appearance, operation, intended play pattern, and plans to advertise on television for Holiday Doll	NO	NO	NO	0
75.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Play Sportz Teamz	NO	NO	NO	0
76.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Couture	NO	NO	NO	0
77.	The appearance, operation, intended play pattern, and plans to advertise on television for Story Time Princess Collection Fashion Dolls	NO	NO	NO	0
78.	The appearance, operation, intended play pattern, and plans to advertise on television for Story Time Classics Collection Mini Dolls	NO	NO	NO	0
79.	The appearance, operation, intended play pattern, and plans to advertise on television for Yummi-Land Soda Pop Girls	NO	NO	NO	0
80.	The appearance, operation, intended play pattern, and	NO	NO	NO	0

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
	plans to advertise on television for Marvel Super Heroes Die-Cast Vehicles	(see prior page)			
81.	The appearance, operation, intended play pattern, and plans to advertise on television for Spider-Man & Friends Crime Cruiser R/C	NO	NO	NO	0
82.	The appearance, operation, intended play pattern, and plans to advertise on television for Spider-Man Fire Rescue R/C	NO	NO	NO	0
83.	The appearance, operation, intended play pattern, and plans to advertise on television for Land Sea R/C AXI Trespass	NO	NO	NO	0
84.	The appearance, operation, intended play pattern, and plans to advertise on television for 6 Foot Bratz Puzzles	NO	NO	NO	0
85.	The appearance, operation, intended play pattern, and plans to advertise on television for I-Petz	NO	NO	NO	0
86.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Mobile Phones	NO	NO	NO	0
87.	The appearance, operation, intended play pattern, and plans to advertise on television for Muichiz	NO	NO	NO	0
88.	The appearance, operation, intended play pattern, and plans to advertise on television for Baby Bratz	NO	NO	NO	0
89.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Pretty N' Punk	NO	NO	NO	0
90.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Fabulous	NO	NO	NO	0
91.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Treasures	NO	NO	NO	0
92.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz direct to Video	NO	NO	NO	0

		1	2	3	4
#	<u>Description</u>	<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
	movie with Twentieth Century Fox				
	(see prior page)				
93.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz music album with Universal Music Enterprises	NO	NO	NO	0
94.	The appearance, operation, intended play pattern, and plans to advertise on television for Livin' Bratz	NO	NO	NO	0
95.	The appearance, operation, intended play pattern, and plans to advertise on television for Giddy Up Girl	NO	NO	NO	0
96.	The appearance, operation, intended play pattern, and plans to advertise on television for Toby	NO	NO	NO	0
97.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Babies	NO	NO	NO	0
98.	The appearance, operation, intended play pattern, plans to advertise on television for, and FOB pricing Lil' Bratz	YES	NO	NO	0
99.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz plug and play	NO	NO	NO	0
100.	The appearance, operation, intended play pattern, and plans to advertise on television for Lil' Bratz Stylin' Sticker Maker	NO	NO	NO	0
101.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz Candyz	NO	NO	NO	0
102.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz DynaMite	NO	NO	NO	0
103.	The appearance, operation, intended play pattern, and plans to advertise on television for Petz Campfire	NO	NO	NO	0
104.	The appearance, operation, intended play pattern, and plans to advertise on television for Oooh La La	NO	NO	NO	0
105.	The appearance, operation, intended play pattern, and plans to advertise on television for Ponyz	NO	NO	NO	0

#	<u>Description</u>	1	2	3	4
		<u>Trade Secret?</u>	<u>Did Mattel Misappropriate?</u>	<u>Improper Means?</u>	<u>Total Damages owed to MGA Entertainment, Inc.</u>
106.	The appearance, operation, intended play pattern, and plans to advertise on television for Twiinz	NO	NO	NO	0
107.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz digital camera	NO	NO	NO	0
108.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz miniature radio	NO	NO	NO	0
109.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz MP3 player	NO	NO	NO	0
110.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz furniture	NO	NO	NO	0
111.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz doll display	NO	NO	NO	0
112.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz bath and beauty products	NO	NO	NO	0
113.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz stationary	NO	NO	NO	0
114.	The appearance, operation, intended play pattern, and plans to advertise on television for Bratz remote control Kendall	NO	NO	NO	0

17. What is the total amount owed to MGA Entertainment, Inc., if any, on its claim for trade secret misappropriation?

\$ 88.5 mil (total of all amounts in column ^{#4} 6)

18. On or before November 20, 2003, did MGA Entertainment, Inc. discover, or should it have discovered through the exercise of reasonable diligence, facts that would have caused a reasonable person to suspect that Mattel has misappropriated any trade secrets listed in Question 16?

Yes

No

19. Has MGA Entertainment, Inc. proven by clear and convincing evidence that Mattel, Inc. acted willfully and maliciously in the misappropriation of any trade secrets?

Yes

No

Mattel's Claim for Intentional Interference with Contractual Relations

20. Complete the chart below to respond to the following question: Has Mattel, Inc. proven that MGA Entertainment, Inc. intentionally interfered with Mattel, Inc.'s contractual relations with any of the following individuals:

	<u>Yes</u>	<u>No</u>
Contractual Relations with Carter Bryant	✓	
Contractual Relations with Ana Cabrera		✓
Contractual Relations with Beatriz Morales		✓
Contractual Relations with Maria Salazar		✓

21. Complete the chart below to respond to the following question: Has Mattel, Inc. proven that Isaac Larian intentionally interfered with Mattel, Inc.'s contractual relations with any of the following Individuals:

	<u>Yes</u>	<u>No</u>
Contractual Relations with Carter Bryant	✓	
Contractual Relations with Ana Cabrera		✓
Contractual Relations with Beatriz Morales		✓
Contractual Relations with Maria Salazar		✓

If your answer is "yes" to Question 20 or 21, proceed to Question 22.

22. What amount of damages, if any, do you award to Mattel, Inc. and against MGA Entertainment, Inc. or Isaac Larian for intentional interference with contractual relations?

	<u>Amount</u>
MGA Entertainment, Inc.	\$ 5,000.00
Isaac Larian	\$ 5,000.00
Total Amount Owed to Mattel for Intentional Interference with Contractual Relations	\$ 10,000.00

Total (Ten thousand Dollars)

23. On or before the following dates, did Mattel discover, or should it have discovered through the exercise of reasonable diligence, facts that would have caused a reasonable person to suspect that MGA Entertainment, Inc. or Isaac Larian intentionally interfered with its contractual relations?

Complete each box with the answers "yes" or "no" in response to this question.

Once you make a choice and answer "yes" to any date, then all later dates as to that defendant must be marked "yes"

Once you make a choice and answer "no" as to any date, then all prior dates as to that defendant must be marked "no"

	2 <u>April 27, 2007</u>	3 <u>April 13, 2007</u>	3 <u>November 23, 2007</u>	4 <u>November 20, 2007</u>
MGA Entertainment, Inc.	<i>yes</i>	<i>yes</i>	<i>yes</i>	<i>yes</i>
Isaac Larian	<i>yes</i>	<i>yes</i>	<i>yes</i>	<i>yes</i>

Once this verdict form is completed, the foreperson of the jury should sign and date on the lines below.

DATED: April 20, 2011

Jury Foreperson

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