20.18B EXPENSES OF AVOIDING CONSEQUENCES

The (first, second, etc.) item of claimed loss is the expense the plaintiff reasonably incurred in an effort to avoid or reduce other losses resulting from the (accident). You may make an award to the plaintiff for such expenses.

# Use Note

This instruction should be used when the plaintiff claims mitigation expenses. If the parties agree the plaintiff took all reasonable steps to mitigate the loss and the only issue is the existence and amount of expenses, this instruction can be used with Instruction 20.01A or 20.01B. If the plaintiff’s actions are contested, this instruction should follow Instruction 20.18A.

# Comment

See Comment to Instruction 20.18A.