### IDJI 9.11 – Property damages - conversion

INSTRUCTION NO. \_\_\_

If the jury decides that the plaintiff is entitled to recover from the defendant, the jury may consider the following damages:

[either]

If the property has been returned, the plaintiff may recover the reasonable cost of necessary repairs to the property, plus the difference between its fair market value before it was taken and its fair market value after its return. In addition, you may award the plaintiff the reasonable value of the use of the property during the time it was detained by the defendant.

[or]

If the property is not returned, the plaintiff is entitled to recover the fair market value of the property taken.

[and]

The plaintiff may recover the reasonable costs and expenses incurred in connection with defendant’s taking the property and in connection with plaintiff’s attempts to recover the property. These expenses are not, however, to include the court costs or attorney fees incurred in this litigation.