

N.C.P.I.—Civil 800.82
INVASION OF PRIVACY—USE OF UNMANNED AIRCRAFT SYSTEM—NUMBER
OF PHOTOGRAPHS.
GENERAL CIVIL VOLUME
MAY 2024
N.C.G.S. § 15A-300.1

800.82 INVASION OF PRIVACY—USE OF UNMANNED AIRCRAFT SYSTEM—
NUMBER OF PHOTOGRAPHS.

The (*state number*) issue reads:

“How many photographs¹ of the plaintiff were published or otherwise publicly disseminated?”²

If you have answered the (*state number*) issue “Yes” in favor of the plaintiff, then you must determine how many photographs of the plaintiff taken by the defendant with an unmanned aircraft system without the plaintiff’s consent were published or otherwise publicly disseminated. On this issue the burden of proof is on the plaintiff. This means that the plaintiff must prove, by the greater weight of the evidence, the number of photographs of the plaintiff that were published or otherwise publicly disseminated. These photographs must be photographs that were taken by the defendant, with an unmanned aircraft system, without the plaintiff’s consent, and for the purpose of publication or other public dissemination.

Finally, as to this (*state number*) issue on which the plaintiff has the burden of proof, it would be your duty to determine the number of photographs of the plaintiff that were published or otherwise publicly disseminated and write that number in the blank space provided.

1. N.C.G.S. § 15A-300.1(e) encapsulates videos, in addition to photographs, for the first time within this claim for relief. As the circumstances may require, revise this instruction accordingly.

2. This issue is meant to aid the trial judge in calculating liquidated damages as set forth in N.C.G.S. § 15A-300.1(e).