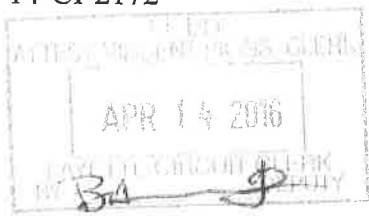


ORIGINAL

COMMONWEALTH OF KENTUCKY  
FAYETTE CIRCUIT COURT  
SEVENTH DIVISION  
CASE NO. 14-CI-2172

WILLIAM BARBER, ET AL.



PLAINTIFFS

v.

UNITED PARCEL SERVICE, INC., ET AL.

DEFENDANTS

**JURY INSTRUCTIONS**

**GENERAL INSTRUCTIONS**

- A. Immediately upon retiring to the jury room, you shall select one of your number as Foreperson.
- B. Nine or more of you must agree in order to answer any of the questions or make any of the determinations required by these instructions. The nine or more of you who agree on one question, however, need not be the same jurors who agree upon another.
- C. If all twelve agree, only the Foreperson must sign his or her name and write his or her juror number on the verdict form for that question.
- D. If nine or more, but not all, agree on a determination or question, the nine or more who agree must sign their names and write their juror numbers on the verdict form individually.

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BA

**INSTRUCTION NO. 1**  
**DEFINITION**

**Constructive discharge:** occurs when an employer makes working conditions so intolerable that a reasonable person in the employee's position would feel compelled to resign

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**INSTRUCTION NO. 2**  
**MISSING EVIDENCE**

If you find from the evidence that notes were in fact prepared by Jim Lewis that recorded material information about a meeting with the Plaintiffs, or a report regarding disparate discipline, and if you further find from the evidence that Defendant UPS intentionally or in bad faith concealed or destroyed the notes and/or report, you may, but are not required to, infer that the information recorded in the notes and/or report would be, if available, adverse to Defendant UPS and favorable to Plaintiffs.

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**INSTRUCTION NO. 3**  
**RACE DISCRIMINATION**

Plaintiffs allege that they were discriminated against on the basis of race. You will find for the Plaintiffs under this instruction if and only if you are satisfied by a preponderance of the evidence that:

- a. Plaintiffs suffered an adverse employment action;
- b. Plaintiffs' race was a motivating factor for the adverse action; AND
- c. The Plaintiffs were treated less favorably than similarly situated employees of other races

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**INTERROGATORY NO. 3(B)**

Are you satisfied from the evidence that:

- a. Plaintiff Goree suffered an adverse employment action;
- b. Plaintiff Goree's race was a motivating factor for the adverse action;

AND

- c. Plaintiff Goree was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] 30299  
Jury Member No.

[Signature] 30301  
Jury Member No.

[Signature] 30300  
Jury Member No.

[Signature] 30302  
Jury Member No.

[Signature] 30304  
Jury Member No.

[Signature] 30303  
Jury Member No.

[Signature] 30305  
Jury Member No.

[Signature] 30306  
Jury Member No.

[Signature] 30307  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

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**INTERROGATORY NO. 3(C)**

Are you satisfied from the evidence that:

- a. Plaintiff Weathers suffered an adverse employment action;
- b. Plaintiff Weathers' race was a motivating factor for the adverse action;

AND

- c. Plaintiff Weathers was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] 3099  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3061  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3082  
Jury Member No.

[Signature] 3310  
Jury Member No.

[Signature] 3337  
Jury Member No.

[Signature] 3030  
Jury Member No.

[Signature] 3201  
Jury Member No.

[Signature] 3808  
Jury Member No.

[Signature] 3023  
Jury Member No.

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**INTERROGATORY NO. 3(D)**

Are you satisfied from the evidence that:

a. Plaintiff Jackson suffered adverse employment action, which includes a constructive discharge;

b. Plaintiff Jackson's race was a motivating factor for the adverse action;

AND

c. Plaintiff Jackson was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u>	<u>3299</u>
Jury Member	No.
<u>[Signature]</u>	<u>3037</u>
Jury Member	No.
<u>[Signature]</u>	<u>3337</u>
Jury Member	No.
<u>[Signature]</u>	<u>3030</u>
Jury Member	No.
<u>[Signature]</u>	<u>3061</u>
Jury Member	No.

<u>[Signature]</u>	<u>3201</u>
Jury Member	No.
<u>[Signature]</u>	<u>3808</u>
Jury Member	No.
<u>[Signature]</u>	<u>3036</u>
Jury Member	No.
<u>[Signature]</u>	<u>3433</u>
Jury Member	No.
_____	_____
Jury Member	No.

\_\_\_\_\_  
Jury Member No.

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**INTERROGATORY NO. 3(E)**

Are you satisfied from the evidence that:

- a. Plaintiff Brown suffered an adverse employment action;
- b. Plaintiff Brown's race was a motivating factor for the adverse action;

AND

- c. Plaintiff Brown was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u><i>Debra Campbell</i></u>	<u>3299</u>
Jury Member	No.
<u><i>Wray Hill</i></u>	<u>3087</u>
Jury Member	No.
<u><i>Kevin Kent</i></u>	<u>3337</u>
Jury Member	No.
<u><i>Donna Sauer</i></u>	<u>3080</u>
Jury Member	No.
<u><i>Lee Ann</i></u>	<u>3201</u>
Jury Member	No.
<u><i>[Signature]</i></u>	<u>3888</u>
Jury Member	No.

<u><i>Kathy Young</i></u>	<u>3261</u>
Jury Member	No.
<u><i>[Signature]</i></u>	<u>3036</u>
Jury Member	No.
<u><i>[Signature]</i></u>	<u>3082</u>
Jury Member	No.
<u><i>[Signature]</i></u>	<u>3023</u>
Jury Member	No.
<u><i>[Signature]</i></u>	<u>3433</u>
Jury Member	No.

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**INTERROGATORY NO. 3(F)**

Are you satisfied from the evidence that:

- a. Plaintiff Ragland suffered an adverse employment action, which includes a constructive discharge;
- b. Plaintiff Ragland's race was a motivating factor for the adverse action;

AND

- c. Plaintiff Ragland was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

Wanda Campbell 3099  
Jury Member No.

Shirley Hill 3037  
Jury Member No.

Donna Sauer 3030  
Jury Member No.

Dee Ann H. 3001  
Jury Member No.

[Signature] 3808  
Jury Member No.

Henry Young 3061  
Jury Member No.

Wynne Kent 3037  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3082  
Jury Member No.

Del Hill 3023  
Jury Member No.

[Signature] 3433  
Jury Member No.

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**INTERROGATORY NO. 3(G)**

Are you satisfied from the evidence that:

- a. Plaintiff Hughes suffered an adverse employment action;
- b. Plaintiff Hughes' race was a motivating factor for the adverse action;

AND

- c. Plaintiff Hughes was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>Donna Campbell</u>	3090	<u>Jerry T. ...</u>	3036
Jury Member	No.	Jury Member	No.
<u>Ally Hill</u>	3037	<u>Jan ...</u>	3082
Jury Member	No.	Jury Member	No.
<u>Donna Sauer</u>	3030	<u>A. Kelly</u>	3433
Jury Member	No.	Jury Member	No.
<u>Leah ...</u>	3201	_____	_____
Jury Member	No.	Jury Member	No.
<u>...</u>	2808	_____	_____
Jury Member	No.	Jury Member	No.
<u>Kathy Young</u>	3361		
Jury Member	No.		

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**INTERROGATORY NO. 3(H)**

Are you satisfied from the evidence that:

- a. Plaintiff Young suffered an adverse employment action;
- b. Plaintiff Young's race was a motivating factor for the adverse action; AND
- c. Plaintiff Young was treated less favorably than similarly situated employees of other races

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u> Jury Member	No.	<u>[Signature]</u> Jury Member	No.
<u>[Signature]</u> Jury Member	No.	<u>[Signature]</u> Jury Member	No.
<u>[Signature]</u> Jury Member	No.	<u>[Signature]</u> Jury Member	No.
<u>[Signature]</u> Jury Member	No.	<u>[Signature]</u> Jury Member	No.
<u>[Signature]</u> Jury Member	No.	<u>[Signature]</u> Jury Member	No.
<u>[Signature]</u> Jury Member	No.	<u>[Signature]</u> Jury Member	No.

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**INSTRUCTION NO. 4(A)**  
**HOSTILE WORK ENVIRONMENT**

Plaintiffs allege that they were subject to a hostile work environment based upon their race by Defendants during their employment at UPS. Hostile work environment is a form of discrimination that is prohibited by Kentucky law. You will find for the Plaintiffs under this Instruction if, and only if, you are satisfied by a preponderance of the evidence that in the course of Plaintiffs' employment with UPS, the Plaintiffs were subjected to racial harassment by UPS, by and through its agents, severe or pervasive enough to create a work environment that a reasonable person would find hostile or abusive, and that the Plaintiffs subjectively regarded as hostile and abusive.

In determining whether the work environment was hostile or abusive, you may consider any of the following factors:

- a. The frequency of the conduct or behavior;
- b. The severity of the conduct or behavior;
- c. Whether the conduct or behavior was physically threatening or humiliating; OR
- d. Whether the conduct or behavior unreasonably interfered with the Plaintiffs' work performance.

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**INSTRUCTION NO. 4(B)**  
**AFFIRMATIVE DEFENSE**

If you find that the Defendants exercised reasonable care to prevent and to correct promptly any alleged racially harassing behavior and that the Plaintiffs unreasonably failed to utilize the measures the employer provided or to avoid harm otherwise, then Defendant UPS cannot be liable for hostile work environment.

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**INTERROGATORY NO. 4(A)(1)**  
**HOSTILE WORK ENVIRONMENT**

Are you satisfied from the evidence that:

- a. In the course of Plaintiff Barber's employment with UPS, Plaintiff Barber was subjected to racial harassment by Defendant UPS;
- b. That such harassment was severe or pervasive enough to create a work environment that a reasonable person would find hostile or abusive; AND
- c. That Plaintiff Barber subjectively regarded the work environment as hostile or abusive.

ANSWER: YES  \_\_\_\_\_ or NO \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>Yethy Young</u> Jury Member	<u>3241</u> No.	<u>Seneca Campbell</u> Jury Member	<u>3299</u> No.
<u>Gregory A. Ad</u> Jury Member	<u>3036</u> No.	<u>[Signature]</u> Jury Member	<u>3037</u> No.
<u>[Signature]</u> Jury Member	<u>3040</u> No.	<u>[Signature]</u> Jury Member	<u>3808</u> No.
<u>[Signature]</u> Jury Member	<u>3810</u> No.	<u>Lee Hamilton</u> Jury Member	<u>3201</u> No.
<u>Kim Kent</u> Jury Member	<u>3837</u> No.	<u>Donna Sauer</u> Jury Member	<u>3030</u> No.
<u>[Signature]</u> Jury Member	<u>3023</u> No.		

If you answered YES to this Interrogatory, please proceed to the next page.

If you answered NO to this Interrogatory, please proceed to Interrogatory 4(B)(1)

**INSTRUCTION NO. 4(A)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

Letty Young 3065  
Jury Member No.

Christopher 3337  
Jury Member No.

Jerry T. St 3036  
Jury Member No.

Greg Campbell 3099  
Jury Member No.

Don Wu 3062  
Jury Member No.

Joe Hamilton 3001  
Jury Member No.

[Signature] 3310  
Jury Member No.

[Signature] 3808  
Jury Member No.

John Hill 3023  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

Donna Sauer 3030  
Jury Member No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.



**INTERROGATORY NO. 4(B)(1)**  
**HOSTILE WORK ENVIRONMENT**

Are you satisfied from the evidence that:

- a. In the course of Plaintiff Goree's employment with UPS, Plaintiff Goree was subjected to racial harassment by Defendant UPS;
- b. That such harassment was severe or pervasive enough to create a work environment that a reasonable person would find hostile or abusive; AND
- c. That Plaintiff Goree subjectively regarded the work environment as hostile or abusive.

ANSWER: YES  \_\_\_\_\_ or NO \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

Kerry Young 30601  
Jury Member No.

Whip Whent 30337  
Jury Member No.

[Signature] 30399  
Jury Member No.

[Signature] 30337  
Jury Member No.

[Signature] 30330  
Jury Member No.

Donna Sauer 30330  
Jury Member No.

[Signature] 30422  
Jury Member No.

[Signature] 3808  
Jury Member No.

[Signature] 3310  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

[Signature] 30223  
Jury Member No.

If you answered YES to this Interrogatory, please proceed to the next page.

If you answered NO to this Interrogatory, please proceed to Interrogatory 4(C)(1)

**INSTRUCTION NO. 4(B)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO   ✓  

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

<u>Sherry Bell</u>	<u>3087</u>
Jury Member	No.
<u>Cheryl Kent</u>	<u>3087</u>
Jury Member	No.
<u>Spring Campbell</u>	<u>3099</u>
Jury Member	No.
<u>Betty Young</u>	<u>3061</u>
Jury Member	No.
<u>Sherry T. St</u>	<u>3036</u>
Jury Member	No.
<u>Donna Sauer</u>	<u>3092</u>
Jury Member	No.

<u>[Signature]</u>	<u>3310</u>
Jury Member	No.
<u>[Signature]</u>	<u>3023</u>
Jury Member	No.
<u>Donna Sauer</u>	<u>3030</u>
Jury Member	No.
<u>[Signature]</u>	<u>3808</u>
Jury Member	No.
_____	_____
Jury Member	No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.



**INSTRUCTION NO. 4(C)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO ✓ \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

Anthony Young 3261  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3042  
Jury Member No.

[Signature] 3310  
Jury Member No.

[Signature] 3033  
Jury Member No.

[Signature] 3034  
Jury Member No.

[Signature] 3337  
Jury Member No.

Donna Sauer 3030  
Jury Member No.

[Signature] 3608  
Jury Member No.

Sonya Campbell 3299  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.

**INTERROGATORY NO. 4(D)(1)**  
**HOSTILE WORK ENVIRONMENT**

Are you satisfied from the evidence that:

- a. In the course of Plaintiff Jackson's employment with UPS, Plaintiff Jackson was subjected to racial harassment by Defendant UPS;
- b. That such harassment was severe or pervasive enough to create a work environment that a reasonable person would find hostile or abusive; AND
- c. That Plaintiff Jackson subjectively regarded the work environment as hostile or abusive.

ANSWER: YES ✓ or NO \_\_\_\_\_  
 (please check only one)

\_\_\_\_\_  
 FOREPERSON No. (if unanimous)

(If not unanimous)

<u>George Campbell</u>	<u>3299</u>
Jury Member	No.
<u>Sherry Tillman</u>	<u>3087</u>
Jury Member	No.
<u>Ulysses Kent</u>	<u>3337</u>
Jury Member	No.
<u>Diana Sauer</u>	<u>3030</u>
Jury Member	No.
<u>Kathy Young</u>	<u>3261</u>
Jury Member	No.
<u>Wing T. Lee</u>	<u>3036</u>
Jury Member	No.

<u>[Signature]</u>	<u>3082</u>
Jury Member	No.
<u>[Signature]</u>	<u>3310</u>
Jury Member	No.
<u>[Signature]</u>	<u>3023</u>
Jury Member	No.
_____	_____
Jury Member	No.
_____	_____
Jury Member	No.

If you answered YES to this Interrogatory, please proceed to the next page.

If you answered NO to this Interrogatory, please proceed to Interrogatory 4(E)(1)

**INSTRUCTION NO. 4(D)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO ✓ \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u> Jury Member	<u>3299</u> No.	<u>[Signature]</u> Jury Member	<u>3036</u> No.
<u>[Signature]</u> Jury Member	<u>3037</u> No.	<u>[Signature]</u> Jury Member	<u>3082</u> No.
<u>[Signature]</u> Jury Member	<u>3337</u> No.	<u>[Signature]</u> Jury Member	<u>3310</u> No.
<u>[Signature]</u> Jury Member	<u>3030</u> No.	<u>[Signature]</u> Jury Member	<u>3023</u> No.
<u>[Signature]</u> Jury Member	<u>3808</u> No.	_____ Jury Member	_____ No.
<u>[Signature]</u> Jury Member	<u>3261</u> No.		

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.



**INSTRUCTION NO. 4(E)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u>	<u>3099</u>
Jury Member	No.
<u>[Signature]</u>	<u>3087</u>
Jury Member	No.
<u>[Signature]</u>	<u>3030</u>
Jury Member	No.
<u>[Signature]</u>	<u>3808</u>
Jury Member	No.
<u>[Signature]</u>	<u>3261</u>
Jury Member	No.
<u>[Signature]</u>	<u>3036</u>
Jury Member	No.

<u>[Signature]</u>	<u>3082</u>
Jury Member	No.
<u>[Signature]</u>	<u>3810</u>
Jury Member	No.
<u>[Signature]</u>	<u>3023</u>
Jury Member	No.
_____	_____
Jury Member	No.
_____	_____
Jury Member	No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.





**INSTRUCTION NO. 4(F)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES te  or NO   
(please check only one)

~~Donna Campbell~~ 3299  
FOREPERSON No. (if unanimous)

(If not unanimous)

Donna Campbell 3099  
Jury Member No.

Shirley Hillman 3087  
Jury Member No.

Cheryl Kent 3337  
Jury Member No.

Donna Sauer 3030  
Jury Member No.

[Signature] 3808  
Jury Member No.

Kathy Young 3261  
Jury Member No.

Douglas T. Ad 3036  
Jury Member No.

[Signature] 3082  
Jury Member No.

[Signature] 3310  
Jury Member No.

John [Signature] 3023  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.



**INSTRUCTION NO. 4(G)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>George Campbell</u>	<u>3299</u>
Jury Member	No.
<u>Steve Allen</u>	<u>3037</u>
Jury Member	No.
<u>Kyle Hart</u>	<u>3337</u>
Jury Member	No.
<u>Dana Sauer</u>	<u>3030</u>
Jury Member	No.
<u>[Signature]</u>	<u>3808</u>
Jury Member	No.
<u>Heather Young</u>	<u>3261</u>
Jury Member	No.

<u>[Signature]</u>	<u>3036</u>
Jury Member	No.
<u>[Signature]</u>	<u>3082</u>
Jury Member	No.
<u>[Signature]</u>	<u>3310</u>
Jury Member	No.
<u>[Signature]</u>	<u>3023</u>
Jury Member	No.
_____	_____
Jury Member	No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.

**INTERROGATORY NO. 4(H)(1)**  
**HOSTILE WORK ENVIRONMENT**

Are you satisfied from the evidence that:

- a. In the course of Plaintiff Young's employment with UPS, Plaintiff Young was subjected to racial harassment by Defendant UPS;
- b. That such harassment was severe or pervasive enough to create a work environment that a reasonable person would find hostile or abusive; AND
- c. That Plaintiff Young subjectively regarded the work environment as hostile or abusive.

ANSWER: YES  or NO   
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u><i>Dennis Campbell</i></u> Jury Member	<u>3299</u> No.	<u><i>Gregory T. Let</i></u> Jury Member	<u>3036</u> No.
<u><i>Sharon Hill</i></u> Jury Member	<u>3007</u> No.	<u><i>[Signature]</i></u> Jury Member	<u>3082</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>3337</u> No.	<u><i>[Signature]</i></u> Jury Member	<u>3310</u> No.
<u><i>Diana Sauer</i></u> Jury Member	<u>3030</u> No.	<u><i>[Signature]</i></u> Jury Member	<u>3023</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>3808</u> No.	_____ Jury Member	_____ No.
<u><i>[Signature]</i></u> Jury Member	<u>3261</u> No.		

If you answered YES to this Interrogatory, please proceed to the next page.

If you answered NO to this Interrogatory, please proceed to Instruction No. 5.

**INSTRUCTION NO. 4(H)(2)**

Are you satisfied from the evidence that:

- a. Defendant UPS exercised reasonable care to prevent or correct promptly any racially harassing behavior; AND
- b. Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by Defendant UPS or to avoid harm otherwise.

ANSWER: YES \_\_\_\_\_ or NO  \_\_\_\_\_

(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u>	<u>3099</u>
Jury Member	No.
<u>[Signature]</u>	<u>3087</u>
Jury Member	No.
<u>[Signature]</u>	<u>3337</u>
Jury Member	No.
<u>[Signature]</u>	<u>3030</u>
Jury Member	No.
<u>[Signature]</u>	<u>3008</u>
Jury Member	No.
<u>[Signature]</u>	<u>3261</u>
Jury Member	No.

<u>[Signature]</u>	<u>3036</u>
Jury Member	No.
<u>[Signature]</u>	<u>3082</u>
Jury Member	No.
<u>[Signature]</u>	<u>3310</u>
Jury Member	No.
<u>[Signature]</u>	<u>3023</u>
Jury Member	No.
_____	_____
Jury Member	No.

If you answered YES to this Interrogatory, you will find in favor of Defendant UPS on this claim. Please proceed to the next page.

If you answered NO to this Interrogatory, you will find in favor of the Plaintiff on this claim. Please proceed to the next page.

**INSTRUCTION NO. 5**  
**RETALIATION**

Plaintiffs allege that Defendants retaliated against them for engaging in protected activity. It is unlawful for an employer to retaliate against an employee for engaging in protected activity. You will find for the Plaintiffs if and only if you are satisfied by a preponderance of the evidence that:

- a. The Plaintiff engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of the Plaintiff's protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against the Plaintiff; AND
- d. There is a causal connection between the Plaintiff's protected activity and the adverse employment action.

PLEASE PROCEED TO THE NEXT PAGE

**INTERROGATORY NO. 5(A)**  
**RETALIATION**

Are you satisfied from the evidence that:

- a. Plaintiff Barber engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of Plaintiff Barber's protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against Plaintiff Barber; AND
- d. There is a causal connection between Plaintiff Barber's protected activity and the adverse employment action.

**ANSWER (as against UPS): YES** \_\_\_\_\_ **or** **NO**  \_\_\_\_\_  
**(please check only one)**

FOREPERSON No. (if unanimous)

(If not unanimous)

<u><i>[Signature]</i></u> Jury Member	<u>30261</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30320</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30320</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30223</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30343</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30327</u> No.

<u><i>[Signature]</i></u> Jury Member	<u>30337</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30330</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30201</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30308</u> No.
<u><i>[Signature]</i></u> Jury Member	<u>30299</u> No.

(CONTINUED ON NEXT PAGE)



ANSWER (as against Mattingly): YES       ✓       or NO         
(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Bethyburg 3261  
Jury Member No.  
[Signature] 3036  
Jury Member No.  
[Signature] 3092  
Jury Member No.  
[Signature] 3310  
Jury Member No.  
[Signature] 3023  
Jury Member No.  
Donna Sawyer 3070  
Jury Member No.

[Signature] 3308  
Jury Member No.  
S. Campbell 3299  
Jury Member No.  
[Signature] 3334  
Jury Member No.  
               
Jury Member No.  
               
Jury Member No.

ANSWER (as against Speaks): YES        or NO       ✓        
(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Bethyburg 3001  
Jury Member No.  
[Signature] 3000  
Jury Member No.

[Signature] 3082  
Jury Member No.  
[Signature] 3034  
Jury Member No.

(CONTINUED ON NEXT PAGE)

[Signature]  
Jury Member No. 5013

[Signature]  
Jury Member No. 5001

[Signature]  
Jury Member No. 5002

[Signature]  
Jury Member No. 5099

[Signature]  
Jury Member No. 5030

\_\_\_\_\_  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

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**INTERROGATORY NO. 5(B)**  
**RETALIATION**

Are you satisfied from the evidence that:

- a. Plaintiff Goree engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of Plaintiff Goree's protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against Plaintiff Goree; AND
- d. There is a causal connection between Plaintiff Goree's protected activity and the adverse employment action.

**ANSWER (as against UPS): YES** \_\_\_\_\_ **or** **NO**  \_\_\_\_\_  
**(please check only one)**

(If not unanimous)		FOREPERSON No. (if unanimous)	
<u>S. Campbell</u>	3099	<u>[Signature]</u>	3201
Jury Member	No.	Jury Member	No.
<u>[Signature]</u>	3201	<u>[Signature]</u>	3037
Jury Member	No.	Jury Member	No.
<u>[Signature]</u>	3038	<u>[Signature]</u>	3030
Jury Member	No.	Jury Member	No.
<u>[Signature]</u>	3032	<u>[Signature]</u>	3009
Jury Member	No.	Jury Member	No.
<u>[Signature]</u>	3023	<u>[Signature]</u>	3037
Jury Member	No.	Jury Member	No.
<u>[Signature]</u>	3043		
Jury Member	No.		

(CONTINUED ON NEXT PAGE)

ANSWER (as against Mattingly): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] 3201  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3052  
Jury Member No.

[Signature] 3343  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3030  
Jury Member No.

[Signature] 3608  
Jury Member No.

[Signature] 3021  
Jury Member No.

[Signature] 3299  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

ANSWER (as against Speaks): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] 3201  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3052  
Jury Member No.

[Signature] 3023  
Jury Member No.

[Signature] 3343  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3299  
Jury Member No.

[Signature] 3337  
Jury Member No.

(CONTINUED ON NEXT PAGE)

Donna Sauer  
Jury Member

2030  
No.

[Signature]  
Jury Member

25036  
No.

[Signature]  
Jury Member

3201  
No.

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**INTERROGATORY NO. 5(C)**  
**RETALIATION**




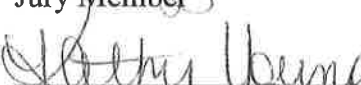

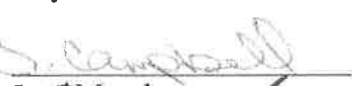

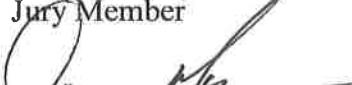

Are you satisfied from the evidence that:

- a. Plaintiff Weathers engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of Plaintiff Weathers' protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against Plaintiff Weathers; AND
- d. There is a causal connection between Plaintiff Weathers' protected activity and the adverse employment action.

**ANSWER (as against UPS): YES \_\_\_\_\_ or NO**   
**(please check only one)**

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

 _____ Jury Member	30306 No.	 _____ Jury Member	30340 No.
 _____ Jury Member	30320 No.	 _____ Jury Member	30261 No.
_____ Jury Member	30337 No.	 _____ Jury Member	30201 No.
 _____ Jury Member	30299 No.	 _____ Jury Member	30343 No.
 _____ Jury Member	30363 No.	_____ Jury Member	_____ No.
 _____ Jury Member	30223 No.		

(CONTINUED ON NEXT PAGE)

ANSWER (as against Mattingly): YES

or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Henry King 30201  
Jury Member No.

Yvonne Kent 33337  
Jury Member No.

Sergio Torres 30336  
Jury Member No.

Donna Sauer 30330  
Jury Member No.

Donna 30482  
Jury Member No.

Robert Hamilton 32017  
Jury Member No.

W. Williams 30323  
Jury Member No.

R. R. 30808  
Jury Member No.

A. Jones 33443  
Jury Member No.

S. Campbell 30299  
Jury Member No.

Michael 30347  
Jury Member No.

ANSWER (as against Speaks): YES

or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Henry King 30201  
Jury Member No.

W. Williams 30323  
Jury Member No.

Sergio Torres 30336  
Jury Member No.

A. Jones 33443  
Jury Member No.

Donna 30482  
Jury Member No.

Michael 30347  
Jury Member No.

(CONTINUED ON NEXT PAGE)

Kyle Ratt 3337  
Jury Member No.

Donna Sawyer 3030  
Jury Member No.

[Signature] 3207  
Jury Member No.

[Signature] 3808  
Jury Member No.

S Campbell 3299  
Jury Member No.

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**INTERROGATORY NO. 5(D)**  
**RETALIATION**

Are you satisfied from the evidence that:

- a. Plaintiff Jackson engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of Plaintiff Jackson's protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against Plaintiff Jackson; AND
- d. There is a causal connection between Plaintiff Jackson's protected activity and the adverse employment action.

**ANSWER (as against UPS): YES**   ✓   **or NO** \_\_\_\_\_  
(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u>	3034
Jury Member	No.
<u>[Signature]</u>	3310
Jury Member	No.
<u>[Signature]</u>	3099
Jury Member	No.
<u>[Signature]</u>	3085
Jury Member	No.
<u>[Signature]</u>	3068
Jury Member	No.
<u>[Signature]</u>	3061
Jury Member	No.

<u>[Signature]</u>	3337
Jury Member	No.
<u>[Signature]</u>	3808
Jury Member	No.
<u>[Signature]</u>	3030
Jury Member	No.
<u>[Signature]</u>	3023
Jury Member	No.
<u>[Signature]</u>	
Jury Member	No.

(CONTINUED ON NEXT PAGE)

ANSWER (as against Mattingly): YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

Lenia Campbell 3299  
FOREPERSON No. (if unanimous)

(If not unanimous)

_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.		

ANSWER (as against Speaks): YES \_\_\_\_\_ or NO  \_\_\_\_\_  
(please check only one)

\_\_\_\_\_  
FOREPERSON No. (if unanimous)

(If not unanimous)

<u>Lenia Campbell 3299</u> _____ Jury Member	_____ No.	<u>Kathy Young 3261</u> _____ Jury Member	_____ No.
<u>[Signature] 3207</u> _____ Jury Member	_____ No.	<u>[Signature] 3036</u> _____ Jury Member	_____ No.
<u>[Signature] 3808</u> _____ Jury Member	_____ No.	<u>[Signature] 3025</u> _____ Jury Member	_____ No.

(CONTINUED ON NEXT PAGE)

J. Henry 3343  
Jury Member No.

[Signature] 3082  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

W. H. Kent 3337  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

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**INTERROGATORY NO. 5(E)**  
**RETALIATION**

Are you satisfied from the evidence that:

- a. Plaintiff Brown engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of Plaintiff Brown's protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against Plaintiff Brown; AND
- d. There is a causal connection between Plaintiff Brown's protected activity and the adverse employment action.

**ANSWER (as against UPS): YES** \_\_\_\_\_ **or** **NO**  \_\_\_\_\_  
**(please check only one)**

FOREPERSON No. (if unanimous)

(If not unanimous)

<u>Deborah</u>	<u>3099</u>
Jury Member	No.
<u>[Signature]</u>	<u>3433</u>
Jury Member	No.
<u>[Signature]</u>	<u>3087</u>
Jury Member	No.
<u>Donna Sauer</u>	<u>3030</u>
Jury Member	No.
<u>[Signature]</u>	<u>3201</u>
Jury Member	No.
<u>Kathy Young</u>	<u>3261</u>
Jury Member	No.

<u>[Signature]</u>	<u>3337</u>
Jury Member	No.
<u>[Signature]</u>	<u>3008</u>
Jury Member	No.
<u>[Signature]</u>	<u>3036</u>
Jury Member	No.
_____	_____
Jury Member	No.
_____	_____
Jury Member	No.

(CONTINUED ON NEXT PAGE)

ANSWER (as against Mattingly): YES \_\_\_\_\_ or NO ✓  
(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

George Campbell 3299  
Jury Member No.  
James Hill 3037  
Jury Member No.  
Dona Sauer 3030  
Jury Member No.  
John Hill 3207  
Jury Member No.  
[Signature] 3808  
Jury Member No.  
Walter Young 3261  
Jury Member No.

George T. Lee 3036  
Jury Member No.  
Walter Hill 3337  
Jury Member No.  
[Signature] 3082  
Jury Member No.  
[Signature] 3433  
Jury Member No.  
\_\_\_\_\_  
Jury Member No.

ANSWER (as against Speaks): YES \_\_\_\_\_ or NO ✓  
(please check only one)

George Campbell 3299  
FOREPERSON No. (if unanimous)

(If not unanimous)

_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.

(CONTINUED ON NEXT PAGE)

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

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ANSWER (as against Mattingly): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Campbell 3299  
Jury Member No.

Stallman 3037  
Jury Member No.

Donna Samu 3030  
Jury Member No.

Bohannon 3207  
Jury Member No.

[Signature] 3808  
Jury Member No.

Wendy Young 3261  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3433  
Jury Member No.

Wendy Kent 3337  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

ANSWER (as against Speaks): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Campbell 3299  
Jury Member No.

Stallman 3037  
Jury Member No.

Wendy Kent 3337  
Jury Member No.

Donna Samu 3030  
Jury Member No.

Bohannon 3207  
Jury Member No.

[Signature] 3808  
Jury Member No.

(CONTINUED ON NEXT PAGE)



[Signature]  
Jury Member

3261  
No.

[Signature]  
Jury Member

3036  
No.

[Signature]  
Jury Member

3082  
No.

[Signature]  
Jury Member

3023  
No.

[Signature]  
Jury Member

3433  
No.

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**INTERROGATORY NO. 5(G)**  
**RETALIATION**

Are you satisfied from the evidence that:

- a. Plaintiff Hughes engaged in protected activity when he complained about racial issues in the workplace;
- b. Defendants UPS, Mattingly, and/or Speaks were aware of Plaintiff Hughes' protected activity;
- c. Defendants UPS, Mattingly, and/or Speaks took adverse employment action against Plaintiff Hughes; AND
- d. There is a causal connection between Plaintiff Hughes' protected activity and the adverse employment action.

**ANSWER (as against UPS):** YES \_\_\_\_\_ or NO  \_\_\_\_\_

**(please check only one)**

FOREPERSON No. (if unanimous)

(If not unanimous)

<u>Scott Campbell</u>	<u>3299</u>
Jury Member	No.
<u>Steve Allen</u>	<u>3037</u>
Jury Member	No.
<u>Wynne Kent</u>	<u>3337</u>
Jury Member	No.
<u>Dana Sauer</u>	<u>3030</u>
Jury Member	No.
<u>Lee H. [Signature]</u>	<u>3207</u>
Jury Member	No.
<u>[Signature]</u>	<u>3808</u>
Jury Member	No.

<u>Henry Young</u>	<u>3261</u>
Jury Member	No.
<u>[Signature]</u>	<u>3036</u>
Jury Member	No.
<u>[Signature]</u>	<u>3082</u>
Jury Member	No.
<u>[Signature]</u>	<u>3023</u>
Jury Member	No.
<u>[Signature]</u>	<u>3433</u>
Jury Member	No.

(CONTINUED ON NEXT PAGE)

ANSWER (as against Mattingly): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Donna Campbell 3299  
Jury Member No.

Wendy Hill 3037  
Jury Member No.

Donna Sauer 3030  
Jury Member No.

Kathy Pump 3041  
Jury Member No.

[Signature] 3023  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

[Signature] 3207  
Jury Member No.

Kyle Kent 3337  
Jury Member No.

[Signature] 3808  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3433  
Jury Member No.

ANSWER (as against Speaks): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Donna Campbell 3299  
Jury Member No.

Wendy Hill 3037  
Jury Member No.

Donna Sauer 3030  
Jury Member No.

Kyle Kent 3337  
Jury Member No.

[Signature] 3201  
Jury Member No.

[Signature] 3808  
Jury Member No.

(CONTINUED ON NEXT PAGE)

[Signature] 3081  
Jury Member No.  
[Signature] 3082  
Jury Member No.  
[Signature] 3083  
Jury Member No.

[Signature] 3086  
Jury Member No.  
[Signature] 3087  
Jury Member No.

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ANSWER (as against Mattingly): YES \_\_\_\_\_ or NO

(please check only one)

FOREPERSON No. (if unanimous)

(If not unanimous)

Scott Campbell 3299  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3037  
Jury Member No.

Wang Sauer 3030  
Jury Member No.

[Signature] 3207  
Jury Member No.

[Signature] 3808  
Jury Member No.

Henry Young 3261  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3082  
Jury Member No.

[Signature] 3077  
Jury Member No.

[Signature] 3423  
Jury Member No.

ANSWER (as against Speaks): YES \_\_\_\_\_ or NO

(please check only one)

Scott Campbell 3299  
FOREPERSON No. (if unanimous)

(If not unanimous)

_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.
_____ Jury Member	_____ No.	_____ Jury Member	_____ No.

(CONTINUED ON NEXT PAGE)

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

\_\_\_\_\_  
Jury Member                      No. \_\_\_\_\_

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**INSTRUCTION NO. 6**  
**DAMAGES**

If you answered YES to one or more of the Interrogatories presented to you, you will determine from the evidence and award a sum or sums of money that will fairly and reasonably compensate each individual Plaintiff for such of the following damages you believe from the evidence have been sustained as a direct result of the Defendants' conduct.

***To Plaintiff William Barber:***

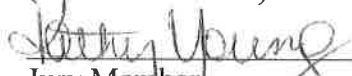
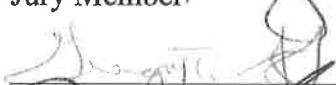
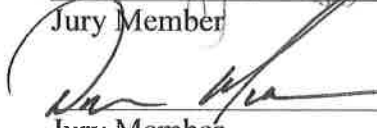


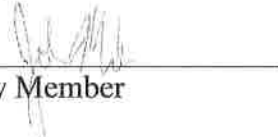
Back Wages (not to exceed \$314.96)

\$314.96

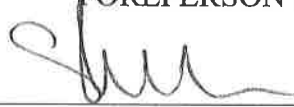

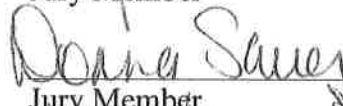
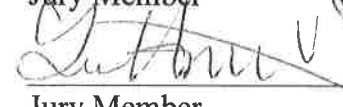
Emotional and mental distress (not to exceed \$1,500,000)

\$1,500,000.00

(If not unanimous)

<u></u>	<u>30201</u>
Jury Member	No.
<u></u>	<u>30306</u>
Jury Member	No.
<u></u>	<u>50669</u>
Jury Member	No.
<u></u>	<u>30299</u>
Jury Member	No.
<u></u>	<u>30310</u>
Jury Member	No.
<u></u>	<u>30323</u>
Jury Member	No.

FOREPERSON No. (if unanimous)

<u></u>	<u>30337</u>
Jury Member	No.
<u></u>	<u>30337</u>
Jury Member	No.
<u></u>	<u>30330</u>
Jury Member	No.
<u></u>	<u>30201</u>
Jury Member	No.

_____	_____
Jury Member	No.

PLEASE PROCEED TO THE NEXT PAGE



**To Plaintiff Jeffrey Goree:**

Emotional and mental distress (not to exceed \$1,500,000) \$ 500,000.00

FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u> Jury Member	<u>30261</u> No.	<u>[Signature]</u> Jury Member	<u>30261</u> No.
<u>[Signature]</u> Jury Member	<u>30310</u> No.	<u>[Signature]</u> Jury Member	<u>30310</u> No.
<u>[Signature]</u> Jury Member	<u>30352</u> No.	<u>[Signature]</u> Jury Member	<u>30352</u> No.
<u>[Signature]</u> Jury Member	<u>30310</u> No.	<u>[Signature]</u> Jury Member	<u>30310</u> No.
<u>[Signature]</u> Jury Member	<u>30323</u> No.	<u>[Signature]</u> Jury Member	<u>30323</u> No.
<u>[Signature]</u> Jury Member	<u>30334</u> No.	<u>[Signature]</u> Jury Member	<u>30334</u> No.

**To Plaintiff Curtis Weathers:**

Back Wages (not to exceed \$30,528.96) \$ 0

Emotional and mental distress (not to exceed \$1,500,000) \$ 100,000.00

FOREPERSON No. (if unanimous)

(If not unanimous)

<u>[Signature]</u> Jury Member	<u>30299</u> No.	<u>[Signature]</u> Jury Member	<u>30299</u> No.
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Jury Member

No.

Jury Member

No.

Jury Member

No.

**To Plaintiff Lamont Brown:**

Back Wages (not to exceed \$12,187)

\$

Future Wages (not to exceed \$1,485,000)

\$

Emotional and mental distress (not to exceed \$1,500,000)

\$

FOREPERSON No. (if unanimous)

(If not unanimous)

Jury Member

No.

Jury Member

No.

Jury Member

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Jury Member

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Jury Member

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Jury Member

No.

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**To Plaintiff Donald Ragland:**

Future Wages (not to exceed \$168,000) \$ 0

Emotional and mental distress (not to exceed \$1,500,000) \$ 500,000.00

FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] 3099  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3030  
Jury Member No.

[Signature] 3007  
Jury Member No.

[Signature] 3000  
Jury Member No.

[Signature] 3010  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3082  
Jury Member No.

[Signature] 3023  
Jury Member No.

[Signature] 3010  
Jury Member No.

**To Plaintiff John Hughes:**

Emotional and mental distress (not to exceed \$1,500,000) \$ 400,000.00

FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] 3099  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3037  
Jury Member No.

[Signature] 3030  
Jury Member No.

(CONTINUED ON NEXT PAGE)

Kathy Young 3081  
Jury Member No.

[Signature] 3082  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

\_\_\_\_\_  
Jury Member No.

[Signature] 3036  
Jury Member No.

[Signature] 3023  
Jury Member No.

[Signature] 3310  
Jury Member No.

**To Plaintiff David Young:**

Emotional and mental distress (not to exceed \$1,500,000)

\$ 1,000,000.00

FOREPERSON No. (if unanimous)

(If not unanimous)

[Signature] \_\_\_\_\_  
Jury Member No. \_\_\_\_\_ Jury Member No. \_\_\_\_\_

[Signature] \_\_\_\_\_  
Jury Member No. \_\_\_\_\_ Jury Member No. \_\_\_\_\_

[Signature] \_\_\_\_\_  
Jury Member No. \_\_\_\_\_ Jury Member No. \_\_\_\_\_

[Signature] 3081 \_\_\_\_\_  
Jury Member No. \_\_\_\_\_ Jury Member No. 3082

Kathy Young \_\_\_\_\_  
Jury Member No. \_\_\_\_\_ Jury Member No. \_\_\_\_\_

[Signature] 3310  
Jury Member No.

YOUR DELIBERATIONS ARE COMPLETE. PLEASE INFORM THE BAILIFF, WHO WILL INSTRUCT YOU WHEN YOU MAY RETURN TO THE COURTROOM.