

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Kelly Dawsey,

Plaintiff,

v.

Bayerische Motoren Werke
Aktiengesellschaft and
BMW Manufacturing Co., LLC,

Defendants.

Civil Action No. 7:22-cv-3738-TMC

VERDICT FORM

We, the jury, unanimously find as follows:

Integrated Employer

1. Do you find that Bayerische Motoren Werke Aktiengesellschaft, also
known as "BMW AG" was an employer of Plaintiff? [check one:]

Yes _____

No [checked] _____

If you answered "Yes" as to Question 1, proceed to Question 2. If you answered
"No" as to Question 1, skip Questions 2 - 5 and proceed to Question 6, found
on page 4.

Answer Questions 2 – 5 ONLY if you found BMW AG to be an employer of Plaintiff and answered “Yes” to Question 1. Otherwise, proceed to Question 6 on page 4.

- 2. On Plaintiff’s claim against Defendants for national origin discrimination under Title VII, [check one:]**

_____ We, the jury, find for the **Plaintiff**.

OR

_____ We, the jury, find for the **Defendants**.

- 3. On Plaintiff’s claim against Defendants for sex discrimination under Title VII, [check one:]**

_____ We, the jury, find for the **Plaintiff**.

OR

_____ We, the jury, find for the **Defendants**.

4. On **Plaintiff's** claim against **Defendants** for race discrimination under Title VII, [check one:]

_____ We, the jury, find for the **Plaintiff**.

OR

_____ We, the jury, find for the **Defendants**.

5. On **Plaintiff's** claim against **Defendants** for race discrimination under Section 1981, [check one:]

_____ We, the jury, find for the **Plaintiff**.

OR

_____ We, the jury, find for the **Defendants**.

If you answered “Yes” to Question 1 (and, therefore, answered Questions 2 – 5), do not answer Questions 6 – 9. Skip to page 6. If you answered “No” to Question 1, please proceed with Questions 6 – 9.

6. On **Plaintiff’s** claim against **BMW Manufacturing Co., LLC**, also known as “**BMW MC**” for national origin discrimination under Title VII, [check one:]

We, the jury, find for the **Plaintiff**.

OR

We, the jury, find for the **Defendant BMW Manufacturing Co., LLC**.

7. On **Plaintiff’s** claim against **BMW Manufacturing Co., LLC** for sex discrimination under Title VII, [check one:]

We, the jury, find for the **Plaintiff**.

OR

We, the jury, find for the **Defendant BMW Manufacturing Co., LLC**.

8. On **Plaintiff's** claim against **BMW Manufacturing Co., LLC** for race discrimination under Title VII, [check one:]

We, the jury, find for the **Plaintiff**.

OR

We, the jury, find for the **Defendant BMW Manufacturing Co., LLC**.

9. On **Plaintiff's** claim against **BMW Manufacturing Co., LLC** for race discrimination under Section 1981, [check one:]

We, the jury, find for the **Plaintiff**.

OR

We, the jury, find for the **Defendant BMW Manufacturing Co., LLC**.

If you did not find for Plaintiff as to any of her claims, your deliberations are done. The Jury Foreperson should certify your verdict by signing and dating the form where indicated below.

If you did find for Plaintiff on any of the claims in Questions 2 – 5 or Questions 6 – 9, please answer the following questions regarding damages prior to having the Jury Foreperson certify your verdict by signing and dating the form where indicated below.

Damages

1. We award compensatory damages in the amount of:

\$ 100,000.00

2. We award punitive damages in the amount of:

\$ 5,000,000.00

This is the unanimous decision of the jury.

Signed _____

Foreperson

Date: February 25, 2026.