

We, the jury, unanimously answer the questions submitted by the court as follows

3. Did plaintiff establish by a preponderance of the evidence that defendant failed to take prompt and adequate action to stop Christina [REDACTED]'s conduct toward him?

YES NO

If your answer to question 3 is "NO," then proceed directly to answer question 7. Do not answer questions 4 through 6.

If your answer to question 3 is "YES," then proceed to answer question 4.

4. What amount of damages, if any, is plaintiff entitled to recover on his sexual harassment claim?

\$ 100,000.00

Regardless of your answer to question 4, proceed to answer question 5.

5. Is plaintiff entitled to punitive damages on his sexual harassment claim?

YES NO

If your answer to question 5 is "NO," then proceed directly to answer question 7. Do not answer question 6.

If your answer to question 5 is "YES," then answer question 6.

6. What amount of punitive damages, if any, is plaintiff entitled to recover on his sexual harassment claim?

\$ 600,000.00

Regardless of your answer to question 6, answer question 7.

COUNT THREE: INTENTIONAL INFLICTION
OF EMOTIONAL DISTRESS

11. Did plaintiff establish by a preponderance of the evidence that defendant intentionally inflicted severe emotional distress on plaintiff by ratifying Christina [REDACTED]'s conduct?

YES _____ NO _____

If your answer to question 11 is "NO," then you are finished. Do not answer any of the remaining questions.

If your answer to question 11 is "YES," then proceed to answer question 12.

12. What amount of damages, if any, is plaintiff entitled to recover on his intentional infliction of emotional distress claim?

\$ 150,000.00

Regardless of your answer to question 12, proceed to answer question 13.

13. Did plaintiff establish by clear and convincing evidence that defendant's intentional infliction of emotional distress was accompanied by fraud, malice, or willful or wanton conduct?

YES _____ NO _____

If your answer to question 13 is "YES," then proceed to answer question 14.

If your answer to question 13 is "NO," then you are finished. Do not answer any of the remaining questions.

14. What amount of punitive damages, if any, is plaintiff entitled to recover on his intentional infliction of emotional distress claim?

\$ 60,000.00