

Read In Open Court 9/12/08 (MTD)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SHANNON A. LAYMON,	*	C.A. No. 07-129 MPT
	*	
Plaintiff,	*	
	*	
v.	*	
	*	
LOBBY HOUSE, INC.,	*	
a Delaware corporation,	*	
	*	
Defendant.	*	

SPECIAL FORM OF VERDICT

THE JURY MUST UNANIMOUSLY AGREE ON THE ANSWERS TO ALL OF THE QUESTIONS. THE COMPLETED SPECIAL VERDICT FORM MUST BE SIGNED AND DATED BY THE FOREPERSON.

1. Has Plaintiff Shannon A. Laymon proven by a preponderance of the evidence that Defendant, the Lobby House, Inc., through its agents and employees, violated her rights under Title VII of the Civil Rights Act by creating a hostile work environment based upon gender?

YES NO

2. If you answered "YES" to question 1, you must decide the Lobby House's affirmative defense. If you answered "No", please proceed to Question 4.

a. Has the Lobby House proven by a preponderance of the evidence that it exercised reasonable care to prevent harassment in the workplace on the basis of gender, and also exercised reasonable care to promptly correct any harassing behavior that did occur and;

b. Has the Lobby House proven by a preponderance of the evidence that Ms. Laymon unreasonably failed to take advantage of any preventive or corrective opportunities provided by the Lobby House?

YES NO

3. If you answered "YES" to question 1 and "No" to question 2, state the monetary amount that will compensate Ms. Laymon for being subjected to a hostile work environment.

\$ 500.00

4. Has Ms. Laymon proved by a preponderance of the evidence that the Lobby House, through its agents and employees, violated her rights under Title VII of the Civil Rights Act by retaliating against her for complaining about the sexually hostile work environment?

YES ✓ NO _____

5. If you answered "YES" to question 4, state the monetary amount that will compensate Ms. Laymon for the Lobby House's retaliation against her for complaining about a sexually hostile work environment. If you answered "NO" to Question 4, please proceed to Question 6.

\$ 1000.00

6. Do you find that the Lobby House retaliated against Ms. Laymon for pursuing her rights under Delaware's workers' compensation statutes?

YES _____ NO _____

7. If you answered "YES" to question 6, state the monetary amount that will compensate Ms. Laymon for the Lobby House's retaliation against her for pursuing her rights under Delaware's workers' compensation statutes.

\$ _____

8. If you answered "YES" to question 1, question 4, or question 6, or to any combination of them, do you find that Lobby House acted willfully or wantonly in violating Ms. Laymon's rights?

YES ✓ NO _____

9. If you answered "YES" to question 8, state the amount of punitive damages that will punish Lobby House for its willful and wanton conduct.

\$ 100,000.00

Respectfully submitted,

DATE: Sept 12, 2008

[Signature]
FOREPERSON