

United States District Court
For the Northern District of California

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ALMA BURRELL,)
)
Plaintiff,)
vs.)
)
COUNTY OF SANTA CLARA,)
)
Defendant.)
_____)

Case No.: 11-CV-04569-LHK

VERDICT FORM

Dated: May 10, 2013



LUCY H. KOH
United States District Judge

1 **ALL JURORS MUST AGREE ON THE ANSWERS TO EACH OF THE QUESTIONS.**

2 **We, the Jury in the above-entitled action, find the following Jury Verdict on the**
3 **questions submitted to us:**

4 **I. DISPARATE TREATMENT (FEHA GOV. CODE § 12940(a))**

5 The parties stipulate that the County of Santa Clara is an employer covered by the Fair
6 Employment and Housing Act and that Plaintiff Alma Burrell has been employed by the County at
7 all times relevant in this lawsuit.

8 QUESTION 1: Did the County of Santa Clara refuse to promote Alma Burrell?

9 ANSWER: Yes ____ No ____

10 If your answer to Question No. 1 is yes, then answer Question No. 2. If you answered no,
11 stop here, answer no further questions, and have the presiding juror sign and date this form.

12 QUESTION 2: Was Alma Burrell's race a motivating reason for the County of Santa
13 Clara's refusal to promote Alma Burrell?

14 ANSWER: Yes ____ No ____

15 If your answer to Question No. 2 is yes, then answer Question No. 3. If you answered no,
16 stop here, answer no further questions, and have the presiding juror sign and date this form.

17 QUESTION 3: Was the County of Santa Clara's refusal to promote Alma Burrell a
18 substantial factor in causing harm to Alma Burrell?

19 ANSWER: Yes ____ No ____

20 If your answer to Question No. 3 is yes, then answer Question No. 4. If you answered no,
21 stop here, answer no further questions, and have the presiding juror sign and date this form.

22 QUESTION 4: What are Alma Burrell's damages for discrimination?

23 (a) Past economic loss: \$ _____

24 (b) Future economic loss: \$ _____

25 (c) Past non-economic loss: \$ _____

26 (d) Future non-economic loss: \$ _____

27 Total: \$ _____

II. FAILURE TO PREVENT DISCRIMINATION (FEHA GOV. CODE § 12940(k))

QUESTION 5: Was Alma Burrell subjected to discrimination in the workplace because of her race?

ANSWER: Yes ____ No ____

If your answer to Question No. 5 is yes, then answer Question No. 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 6: Did the County of Santa Clara fail to take reasonable steps to prevent the discrimination?

ANSWER: Yes ____ No ____

If your answer to Question No. 6 is yes, then answer Question No. 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 7: Was the County of Santa Clara's failure to prevent the discrimination a substantial factor in causing harm to Alma Burrell?

ANSWER: Yes ____ No ____

If your answer to Question No. 7 is yes, then answer Question No. 8. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

QUESTION 8: What are Alma Burrell's damages for failure to prevent discrimination? If you awarded damages in Question No. 4, you must not include those damages in response to Question No. 8.

(a) Past economic loss: \$ _____

(b) Future economic loss: \$ _____

(c) Past non-economic loss: \$ _____

(d) Future non-economic loss: \$ _____

Total: \$ _____

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The Jury Foreperson should then sign and date the verdict form in the spaces below and notify the Bailiff that you have reached a verdict. The Jury Foreperson should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

DATED: _____, 2013

By: _____
Jury Foreperson