

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ALBERT SNYDER,	:	
Plaintiff,	:	Case No. RDB-06-1389
	:	
v.	:	
	:	
FRED W. PHELPS, Sr., <i>et al.</i> ,	:	
Defendants.	:	

PUNITIVE DAMAGES

1) What is the total amount of punitive damages that you find should be awarded against the Defendants in this case?

TOTAL: \$ 8 million dollars

2) After determining the total amount of punitive damages, you must apportion the total amount first among the two separate counts, and then among the individual Defendants.

COUNT I: Invasion of Privacy by Intrusion upon Seclusion

Subtotal Count I: \$6 million dollars

If you have found that punitive damages should be awarded under Subtotal Count I, you must apportion the amount among the following Defendants:

Fred W. Phelps, Sr.:	<u>\$1.5 million dollars</u>
Westboro Baptist Church, Inc.:	<u>\$1.5 million dollars</u>
Shirley L. Phelps-Roper:	<u>\$1.5 million dollars</u>
Rebekah A. Phelps-Davis:	<u>\$1.5 million dollars</u>

COUNT II: Intentional Infliction of Emotional Distress

Subtotal Count II: \$ 2 million dollars

If you have found that punitive damages should be awarded under Subtotal Count II, you must apportion the amount among the following Defendants:

Fred W. Phelps, Sr.: \$ 500,000 Thousand dollars

Westboro Baptist Church, Inc.: \$ 500,000 Thousand dollars

Shirley L. Phelps-Roper: \$ 500,000 Thousand dollars

Rebekah A. Phelps-Davis: \$ 500,000 Thousand dollars

Date: October 31, 2007