

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JOSE SOTO,

Plaintiff,

v.

[DRAFT]
SPECIAL VERDICT

KELLY RICKEY, MATTHEW GRANT,
RICK DONOVAN, WILLIAM GEE,
JASON KROCKER, and WILLIAM LEFEVRE,

14-cv-514-jdp

Defendants.

We, the jury, for our special verdict, do find as follows:

QUESTION NO. 1: On July 18, 2011, did any of the following defendants intentionally use force for the purpose of harming plaintiff Jose Soto, and not in a good faith effort to maintain or restore security or discipline?

Kelly Rickey: _____ (Yes or No)

Matthew Grant: _____ (Yes or No)

Rick Donovan: _____ (Yes or No)

William Gee: _____ (Yes or No)

Jason Krocker: _____ (Yes or No)

William LeFevre: _____ (Yes or No)

If you answer “Yes” to any part of Question 1, go on to Question 2 and Question 3.

If you answer “No” to all of Question 1, do not answer any more questions.

QUESTION NO. 2: What amount of money, if any, will fully and fairly compensate plaintiff Jose Soto for the harm caused by defendants?

\$ _____

Go on to Question 3.

QUESTION NO. 3: Did any of the defendants for whom you answered “Yes” in Question 1 act in a way that demonstrated a willful or reckless disregard for the law?

Kelly Rickey: _____ (Yes or No)

Matthew Grant: _____ (Yes or No)

Rick Donovan: _____ (Yes or No)

William Gee: _____ (Yes or No)

Jason Krocker: _____ (Yes or No)

William LeFevre: _____ (Yes or No)

If you answered “Yes” to any part of Question 3, go on to Question 4 with respect to that defendant or those defendants. If you answered “No” to all of Question 3, do not answer any more questions.

QUESTION NO. 4: What amount of money, if any, do you award as punitive damages?

Kelly Rickey: \$ _____

Matthew Grant: \$ _____

Rick Donovan: \$ _____

William Gee: \$ _____

Jason Krocker: \$ _____

William LeFevre: \$ _____

Presiding Juror

Madison, Wisconsin

Dated this ___ day of July, 2017