

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

RENT-A-CENTER EAST, INC.,

Defendant.

No. 16-CV-2222

Magistrate Judge Eric I. Long

PROPOSED VERDICT FORM

Plaintiff U.S. Equal Employment Opportunity Commission hereby submits its Proposed Verdict Form.

Respectfully submitted,

s/ Miles Shultz
U.S. Equal Employment
Opportunity Commission
500 W. Madison St., Ste. 2000
Chicago, IL 60661
312-869-8053

Justin Mulaire
U.S. Equal Employment
Opportunity Commission
33 Whitehall St., Fl. 5
New York, NY 10004
212-336-3744

VERDICT FORM

- 1) Was Megan Kerr’s transgender status a motivating factor in Rent-A-Center’s decision to discharge her?

Answer Yes or No: _____

If your answer to Question No. 1 is “Yes,” then answer Question No. 2. If you answered “No” to Question No. 1, then proceed to the end of this form and sign and return this verdict form.

- 2) Would Rent-A-Center have made the same decision to discharge Megan Kerr even if it had not considered her transgender status?

Answer Yes or No: _____

If your answer to Question No. 2 is “No,” then proceed to Question No. 3. If you answered “Yes” to Question No. 2, then proceed to the end of this form and sign and return this verdict form.

- 3) What amount will fairly compensate Megan Kerr for the physical, emotional, and/or mental pain she experienced, if any, as a result of Rent-A-Center’s decision to discharge her?

Answer: \$ _____

Proceed to Question No. 4.

- 4) Are punitive damages appropriate?

Answer Yes or No: _____

If you answered “Yes” to Question No. 4, then answer Question No. 5. If you answered “No” to Question No. 4, then proceed to the end of this form and sign and return this verdict form.

5) What amount will be sufficient to punish Rent-A-Center for its conduct and to serve as an example or warning to Rent-A-Center and others not to engage in similar conduct in the future?

Answer: \$ _____

Dated this _____ day of February 2018.

Juror #1: _____

Juror #2: _____

Juror #3: _____

Juror #4: _____

Juror #5: _____

Juror #6: _____

Juror #7: _____

Juror #8: _____