

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

ALINA BOYDEN and
SHANNON ANDREWS,

Plaintiffs,

Case No. 17-cv-264

v.

STATE OF WISCONSIN DEPARTMENT
OF EMPLOYEE TRUST FUNDS, et al.,

Defendants.

PLAINTIFFS' PROPOSED SPECIAL VERDICT FORM - DAMAGES

Plaintiffs, by their undersigned attorneys, submit the following Proposed Special Verdict form regarding the issues of damages:

If you answered "Yes" to QUESTION 1, QUESTION 2, or QUESTION 3, please answer the following questions:

QUESTION NO. 4: What sum of money will fairly compensate Plaintiff, Alina Boyden, for her out-of-pocket expenses incurred as a result of Defendants' discriminatory conduct?

Answer: _____

QUESTION NO. 5: What sum of money will fairly compensate Plaintiff, Alina Boyden, for her pain and suffering and loss of a normal life incurred as a result of Defendants' discriminatory conduct?

Answer: _____

QUESTION NO. 6: What sum of money will fairly compensate Plaintiff, Shannon Andrews, for her out-of-pocket expenses incurred as a result of Defendants' discriminatory conduct?

Answer: _____

QUESTION NO. 7: What sum of money will fairly compensate Plaintiff, Shannon Andrews, for her pain and suffering and loss of a normal life incurred as a result of Defendants' discriminatory conduct?

Answer: _____

If you answered "Yes" to QUESTIONS 1 OR 2, please answer the following question:

QUESTION NO. 8: Did Defendants act in reckless disregard of Plaintiffs' rights?

Yes _____ No _____

If you answered "Yes" to QUESTION 8, please answer the following question:

QUESTION NO. 9: What amount of punitive damages do you award?

Answer: _____

Dated this 7th day of September, 2018.

HAWKS QUINDEL, S.C.

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