

FILED
 U.S. DISTRICT COURT
 NORTHERN DISTRICT OF IOWA
 FEB 17 PM 4:20
 SIOUX CITY DIV OFFICE
 BY [Signature]

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF IOWA
 CENTRAL DIVISION

RANDALL HERBERT WEBNER,
 Plaintiff,
 vs.
 TITAN DISTRIBUTION, INC.,
 Defendant.

No. C 97-3101-MWB

VERDICT FORM

On the claims of plaintiff Randall Herbert Webner against defendant Titan Distribution, Inc., we the Jury, find as follows:

LIABILITY		
Claim	As explained in	Verdict for
Disability Discrimination	Final Jury Instruction No. 3	<input checked="" type="checkbox"/> Randall Webner or <input type="checkbox"/> Titan Distribution
<i>If you found in favor of Randall Webner on this claim, on what basis do you find the defendant discriminated? (Check all that apply.)</i>		
	Actual disability	<input checked="" type="checkbox"/>
	Record of a disability	<input checked="" type="checkbox"/>
	Perceived disability	<input checked="" type="checkbox"/>
Retaliation	Final Jury Instruction No. 4	<input checked="" type="checkbox"/> Randall Webner or <input type="checkbox"/> Titan Distribution

85.

ACTUAL DAMAGES as explained in Final Jury Instructions No. 5 and No. 6 <i>(You may only award actual damages for claims on which you found in Mr. Webner's favor.)</i>		
Damages for Emotional distress	for disability discrimination , since the wrong-doing to the present time	\$ <u>12,500</u>
	for retaliation , since the wrong-doing to the present time	\$ <u>12,500</u>
Backpay	for lost wages and benefits that were a direct result of either disability discrimination or retaliation or both	\$ <u>13,771</u>
PUNITIVE DAMAGES as explained in Final Jury Instruction No. 7 <i>(You may only award punitive damages for claims on which you found in Mr. Webner's favor.)</i>		
Disability Discrimination	Do you find that the defendant acted with malice or reckless indifference to Mr. Webner's right not to be discriminated against on the basis of a disability, record of disability, or perceived disability?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	What amount of punitive damages, if any, do you award for disability discrimination?	\$ <u>100,000</u>
Retaliation	Do you find by a preponderance of clear, convincing, and satisfactory evidence that the conduct of the defendant constituted willful and wanton disregard of the rights or safety of another?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	What amount of punitive damages, if any, do you award for retaliation?	\$ <u>100,000</u>
	Was the retaliatory conduct of the defendant directed specifically at Randall Webner?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2-17-2000

Date

