

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JONAH LONG,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:13-cv-01619-JMS-DKL
)	
MATTHEW KINKADE,)	
)	
Defendant.)	

Court’s Proposed Verdict Form

We, the jury in the above-entitled action, unanimously answer the following questions:

1. Did the Plaintiff, Jonah Long, prove by a preponderance of the evidence that Defendant, Matthew Kinkade, violated his Fourth Amendment rights by subjecting him to an unlawful search? (check one)

_____ Yes, Matthew Kinkade is assessed \$1.00 in nominal damages.

_____ No.

[If you answered “yes” to question number 1 go on to answer question number 2. If you answered “no” to question number 1, then the foreperson should sign the verdict form at the bottom, and you should not answer any more questions on this verdict form.]

2(a). Has the plaintiff, Jonah Long, proven by a preponderance of the evidence that Matthew Kinkade is liable to Plaintiff for punitive damages?

Yes _____ No _____ (check one)

[If you answered “no” to this question, the foreperson should sign the verdict form at the bottom, and you should not answer any more questions on this verdict form. If you answered “yes” you should go on to answer question 2(b).]

2(b). Defendant Matthew Kinkade is assessed \$ _____ in punitive damages.

[The foreperson should sign and date this verdict form.]

Foreperson

Date