

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

JOHN W. PEROTTI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:10-CV-00086-JMS-WGH
)	
MS. QUIONES Educ. Dir., and)	
MS. KELSHEIMER Asst. Educ. Dir.,)	
)	
Defendants.)	

PROPOSED VERDICT FORM

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

1(a). Did the Plaintiff, John W. Perotti, prove by a preponderance of the evidence that Defendant, Ms. Diane Quinones, retaliated against him for filing grievances through the prison's administrative remedies system?

Yes _____ No _____ (check one)

1(b). Did the Plaintiff, John W. Perotti, prove by a preponderance of the evidence that Defendant, Ms. Billie Kelsheimer, retaliated against him for filing grievances through the prison's administrative remedies system?

Yes _____ No _____ (check one)

[If you answered question number 1 by finding at least one Defendant liable go on to answer question numbers 2 and 3. If no Defendant was found liable, then the foreperson should sign the verdict form at the bottom, and you should not answer any more questions on this verdict form.]

2. The Plaintiff has proven by a preponderance of the evidence that he is entitled to compensatory damages in the amount of:

3(a). Has the Plaintiff proven by a preponderance of the evidence that any Defendant 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 3(b).]

3(b). List the name of each Defendant (if any) who is liable for punitive damages and the amount of punitive damages assessed against that Defendant. [List only any defendant you find liable for punitive damages.]

Defendant _____ is assessed \$ _____ in punitive damages.

Defendant _____ is assessed \$ _____ in punitive damages.

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

Foreperson

Date