

Final

NICOLE WALLACE, *et al.*

Plaintiff

v.

STATE OF MARYLAND, *et al.*

Defendant

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No: 24-C-17-006410

* * * * *

VERDICT SHEET

1. Do you find by a preponderance of evidence, that Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention and Services, violated Plaintiff, Daquan Wallace's rights under Article 24 of the Maryland Declaration of Rights by failing to protect him from violence by another detainee?

Yes No

2. Do you find by a preponderance of evidence that Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention and Services, violated Plaintiff, Nicole Wallace's right to freedom of speech under Article 40 of the Maryland Declaration of Rights?

Yes No

3. Do you find by a preponderance of evidence that Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention and Services, violated Plaintiff, Daquan Wallace's rights by engaging in unconstitutional customs, policies, or practices in violation of the Maryland Declaration of Rights?

Yes No

4. Do you find by a preponderance of evidence that Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention and Services negligently trained or supervised its employees and as a result those employees were the direct and proximate cause of any injuries to the Plaintiff, Daquan Wallace?

Yes No

5. Do you find by a preponderance of evidence that the negligence of Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention employees was a direct and proximate cause of any injuries to the Plaintiff, Daquan Wallace?

Yes No

6. Do you find by a preponderance of the evidence that Daquan Wallace was contributorily negligent?

Yes No

7. Do you find by a preponderance of the evidence that Daquan Wallace assumed the risk of his actions?

Yes _____

No _____

8. Do you find by a preponderance of evidence that Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention employees acted in concert to cause Plaintiff, Daquan Wallace to fear an intentional threat by words or acts, of physical harm?

Yes _____

No _____

9. Do you find by a preponderance of evidence that Defendants, State of Maryland, Department of Public Safety and Correctional Services and Pretrial Detention employees acted in concert to cause physical harm to Plaintiff, Daquan Wallace?

Yes _____

No _____

If you answered yes to any of the questions, proceed to the next section. Otherwise, stop.

DAMAGES

In what amount do you assess for the following:

10. Plaintiff Daquan Wallace for non-economic damages for the State's violation of Plaintiff's constitutional rights.

\$ \$10 million

11. Plaintiff Daquan Wallace for non-economic damages for the State's negligence.

\$ \$15 million

~~12. Plaintiff Daquan Wallace for non-economic damages for the State's assault.~~

~~\$ _____~~

~~13. Plaintiff Daquan Wallace for non-economic damages for the State's battery.~~

~~\$ _____~~

14. Plaintiff Nicole Wallace for non-economic damages for the State's violation of Plaintiff's constitutional right to free speech under Article 40.

\$ 25 million

Jury Foreperson

Date