

NOTIFY

original

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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss:

SUPERIOR COURT

CIVIL ACTION NO: 2014-2253-B

NOTICE SENT

05.25.18

M | HAW
A.A.M.

P.A.
L.G.
R.J.W.
E.A.H.

GESSY TOUSSAINT

v.

**BRIGHAM AND WOMEN'S HOSPITAL and
MARY ANNE KENYON**

(LAT)

JURY VERDICT SLIP

Race Discrimination Claims

1. Has Plaintiff Gessy Toussaint proved by a preponderance of the evidence that Brigham and Women's Hospital discriminated against her on the basis of her race?

Yes _____ No ✓

2. Has Plaintiff Gessy Toussaint proved by a preponderance of the evidence that Mary Anne Kenyon discriminated against her on the basis of her race?

Yes _____ No ✓

Retaliation Claims

3. Has Plaintiff Gessy Toussaint proved by a preponderance of the evidence that Brigham and Women's Hospital retaliated against her for engaging in protected activity?

Yes ✓ No _____

4. Has Plaintiff Gessy Toussaint proved by a preponderance of the evidence that Mary Anne Kenyon retaliated against her for engaging in protected activity?

Yes ✓ No _____

IF YOU ANSWERED "NO" TO QUESTIONS 1-4, YOU HAVE REACHED A VERDICT. PLEASE NOTIFY YOUR COURT OFFICER AND YOU WILL BE BROUGHT BACK INTO THE COURTROOM.

IF YOU ANSWERED "YES" TO ANY OF QUESTIONS 1-4, PLEASE GO ON TO ANSWER QUESTIONS 5-9.

Damage Claims

5. What amount of damages, if any, do you award Ms. Toussaint for loss of back pay caused by:

a. Brigham and Women's Hospital

FIVE HUNDRED SEVENTEEN THOUSAND DOLLARS
(AMOUNT IN WORDS)

\$117,000
(AMOUNT IN NUMBERS)

b. Mary Anne Kenyon

FIFTY NINE THOUSAND DOLLARS
(AMOUNT IN WORDS)

\$59,000
(AMOUNT IN NUMBERS)

6. What amount of damages, if any, do you award Ms. Toussaint for loss of front pay caused by:

a. Brigham and Women's Hospital

ONE HUNDRED NINETY ONE THOUSAND DOLLARS
(AMOUNT IN WORDS)

\$191,000
(AMOUNT IN NUMBERS)

b. Mary Anne Kenyon

NINETY SIX THOUSAND DOLLARS
(AMOUNT IN WORDS)

\$96,000
(AMOUNT IN NUMBERS)

7. What amount of damages, if any, do you award Ms. Toussaint for emotional distress caused by:

a. Brigham and Women's Hospital

ONE HUNDRED THIRTY SEVEN THOUSAND SEVEN HUNDRED FIFTY FIVE DOLLARS
(AMOUNT IN WORDS)

\$1,375,000
(AMOUNT IN NUMBERS)

b. Mary Anne Kenyon

ONE HUNDRED THIRTY SEVEN THOUSAND SEVEN HUNDRED FIFTY FIVE DOLLARS
(AMOUNT IN WORDS)

\$1,375,000
(AMOUNT IN NUMBERS)

8. If you answered "YES" to any one of Questions 1-4, has Gessy Toussaint proved by a preponderance of the evidence that the conduct of Brigham and Women's Hospital and/or Mary Anne Kenyon was outrageous or egregious, involving evil motive or reckless indifference to the rights of others?

a. Brigham and Women's Hospital

Yes No

b. Mary Anne Kenyon

Yes No

IF YOU ANSWERED "NO" TO BOTH QUESTIONS 8a and 8b, YOU HAVE REACHED A VERDICT. PLEASE NOTIFY YOUR COURT OFFICER AND YOU WILL BE BROUGHT BACK INTO THE COURTROOM.

IF YOU ANSWERED "YES" TO EITHER QUESTION 8a or 8b, PLEASE GO ON TO ANSWER QUESTION 9.

9. What amount, if any, do you award Ms. Toussaint for punitive damages caused by the Defendants?

TWENTY FIVE MILLION DOLLARS
(AMOUNT IN WORDS)

\$25,000,000
(AMOUNT IN NUMBERS)

I certify that the answers on this Verdict Slip pages 1-4 represent the answers of at least 10 of the 11 deliberating jurors.



FOREPERSON OF THE JURY

DATED: May²³, 2018