

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

SPECIAL VERDICT ON DAMAGES

Plaintiff,

v.

09-cv-528-slc

JPMORGAN CHASE BANK, N.A.,

Defendant.

We, the jury, for our special verdict on damages, do find as follows:

Question No. 1

What amount, if any, would fairly and reasonably compensate Lisa McCurty for her emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and other non-monetary losses caused by defendant Chase Bank's failure to promote her to the October 2008 SSA position?

ANSWER: \$ _____

Question No. 2

Did defendant Chase Bank recklessly disregard Lisa McCurty's federally protected right to be free from race or sex (pregnancy) discrimination?

ANSWER: _____
("yes" or "no")

If you answered Question No. 2 "yes," then answer Question No. 3.

If you answered Question No. 2 "No," then do not answer any other question.

Question No. 3

Did Chase Bank make a good faith effort to implement an anti-discrimination policy?

ANSWER: _____
("yes" or "no")

If you answered Question No. 3 "yes," then do not answer Question No. 4.

If you answered Question No. 3 "no," then answer Question No. 4.

Question No. 4

What amount, if any, of punitive damages should be assessed against defendant JPMorgan Chase Bank, N.A.?

ANSWER: \$ _____

FOREPERSON

Madison, Wisconsin

Date: _____