

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

TYRONDA JAMES,  
*Plaintiff,*

v.

RD AMERICA, LLC, *d/b/a* Restaurant  
Depot, JETRO HOLDINGS, LLC, *d/b/a*  
Restaurant Depot, RESTAURANT DEPOT,  
LLC, *d/b/a* Restaurant Depot,  
*Defendants.*

No. 3:16-cv-1445 (VAB)

**VERDICT FORM  
(REVISED)**

**I. LIABILITY: HOSTILE WORK ENVIRONMENT CLAIM**

1. Did Ms. James prove by a preponderance of the evidence that Restaurant Depot created or maintained a racially hostile work environment in violation of Title VII?

Yes: \_\_\_\_\_ No: \_\_\_\_\_

*If you answered "Yes," proceed to I.2*

*If you answered "No," proceed to III (Conclusion of Deliberations)*

2. Did Ms. James prove that those responsible for creating or maintaining a racially hostile work environment were supervisors with respect to her?

Yes: \_\_\_\_\_ No: \_\_\_\_\_

*If you answered "Yes," proceed to I.2a (Supervisor Conduct)*

*If you answered "No," proceed to I.2b (Co-Worker Conduct)*

**a. Supervisor Conduct**

Did Restaurant Depot prove by a preponderance of the evidence that it is entitled to an affirmative defense on the question of liability?

Yes: \_\_\_\_\_ No: \_\_\_\_\_

*If you answered "Yes," proceed to III (Conclusion of Deliberations)*

*If you answered "No," proceed to II (Damages)*

**b. Co-Worker Conduct**

Did Ms. James prove by a preponderance of the evidence that Restaurant Depot was negligent in permitting the conduct of co-workers to occur?

Yes: \_\_\_\_\_ No: \_\_\_\_\_

*If you answered "Yes," proceed to II (Damages)*

*If you answered "No," proceed to III (Conclusion of Deliberations)*

**II. DAMAGES**

**1. Compensatory Damages**

What amount of compensatory damages, if any, do you award Ms. James?

Compensatory Damages:     \$ \_\_\_\_\_

*If you do not award compensatory damages, proceed to II.2 (Nominal Damages)*

*If you award compensatory damages, proceed to II.3 (Punitive Damages)*

**2. Nominal Damages**

If you did not award Ms. James any compensatory damages, do you award Ms. James \$1 in nominal damages?

Yes:     \_\_\_\_\_                 No:     \_\_\_\_\_

*Regardless of your answer to II.B, proceed to II.C (Punitive Damages)*

**3. Punitive Damages**

a. Do you find that awarding punitive damages to Ms. James is appropriate?

Yes:     \_\_\_\_\_                 No:     \_\_\_\_\_

*If you answered “No,” proceed to III (Conclusion of Deliberations)*

*If you answered “Yes,” proceed to II.3.b:*

b. If you answered “Yes” to II.3.a, what amount of punitive damages, if any, do you award Ms. James?

Punitive Damages:                 \$ \_\_\_\_\_

**III. CONCLUSION OF DELIBERATIONS**

Thank you. Your deliberations are now complete. Your jury foreperson should note the date and time below and sign in the space provided. You should notify the Marshal that you have reached a verdict. Your completed Verdict Form will then be returned to the Court.

\_\_\_\_\_ a.m./p.m. \_\_\_\_\_  
Date                                 Time                                 Signature of Foreperson