

FILED
KING COUNTY, WASHINGTON

The HON. BRUCE E. HELLER
Trial Date: July 21, 2008

AUG 15 2008

SUPERIOR COURT CLERK
BY JANIE SMOTER
DEPUTY

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

BARBARA COREY, Individually,

Plaintiff,

vs.

PIERCE COUNTY; PIERCE COUNTY
PROSECUTING ATTORNEY'S OFFICE,

Defendants.

No. 06-2-14647-6 KNT

SPECIAL VERDICT FORM

WE, THE JURY, answer the questions submitted by the court as follows:

1. Do you find that a contract for just cause termination existed under the elements of promissory estoppel?

ANSWER:

Yes No

(If your answer to either question number 1 is "yes" go to question number 2.

If your answer to question 1 is "no" go to question number 4.)

2. Did Defendant breach that contract by forcing Plaintiff to resign and/or terminating her without just cause?

SPECIAL VERDICT FORM - 1

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ANSWER:

Yes No

(If your answer to question number 2 is "yes" go to question number 3. If the answer is "no" go to question number 4.)

3. What is the dollar value of actual damage to Plaintiff caused by this breach?

ANSWER:

\$ 124,994

4. Did Defendant negligently disseminate confidential information?

ANSWER:

Yes No

(If your answer to question number 4 is "yes" go to question number 5. If the answer is "no" go to question number 6.)

5. Was Defendant's negligence a proximate cause of injury or damage to the Plaintiff?

ANSWER:

Yes No

(Go to question number 6.)

6. Do you find that Plaintiff has satisfied the elements of her defamation claim?

ANSWER:

Yes No

(Go to question number 7.)

7. Do you find that Plaintiff satisfied the elements of her defamation by implication claim?

ANSWER:

Yes No

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13. What do you find to be the Plaintiff Barbara Corey's amount of damages?

a. Damage to Reputation. (Answer only if you answered "yes" to question 8.)

ANSWER: \$ 1,500,000

b. Noneconomic Damages. (Answer only if you answered "yes" to any of questions 5, 10, or 12. Do not include any damages which are awarded in response to question 13(a).)

ANSWER: \$ 750,000

c. Economic Damages. (Answer only if you answered "yes" to any of questions 5, 8, 10, or 12. Do not include damages already set forth in response to questions 3.)

ANSWER: \$ 700,176

(INSTRUCTION: Please sign this verdict form.)

DATE: 8/15/2008

David P. Horne
Presiding Juror

DAVID P. HORNE