

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 17-CV-21955-GAYLES/OTAZO-REYES

MARIE L. JEAN PIERRE,)
)
Plaintiff,)
)
v.)
)
PARK HOTELS & RESORT INC., a foreign)
corporation F/K/A HILTON WORLDWIDE INC.,)
)
Defendant.)

VERDICT FORM

Section One: Failure to Accommodate Religious Request

Do you find from a preponderance of the evidence:

1. Did Plaintiff have a sincerely held religious belief, practice, or observance that conflicted with the employment requirement?

Answer Yes or No

Yes

[Note: If your answer is "No," you need not answer the remaining questions in Section One.]

2. Did Defendant know about the conflict between the religious belief, practice, or observance and the employment requirements?

Answer Yes or No

Yes

[Note: If your answer is "No," you need not answer the remaining questions in Section One.]

3. Was Plaintiff's employment terminated for failing to comply with the conflicting employment requirement?

Answer Yes or No

Yes

[Note: If your answer is “No,” you need not answer the remaining questions in Section One.]

4. Did Defendant offer Plaintiff a reasonable accommodation in response to her request?

Answer Yes or No

Yes

[Note: If your answer is “Yes,” you need not answer the remaining questions in Section One.]

5. Would the accommodation sought by Plaintiff have resulted in undue hardship to Defendant?

Answer Yes or No

[Note: If your answer is “Yes,” you need not answer the remaining questions in Section One.]

6. Should Plaintiff be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No

7. Should Plaintiff be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No

8. Should punitive damages be assessed against the Defendant?

Answer Yes or No _____

Section Two: Religious Discrimination

Do you find from a preponderance of the evidence:

9. Was Plaintiff's religion a motivating factor that prompted Defendant to terminate her employment?

Answer Yes or No

NO

[Note: If your answer is "No," you need not answer the remaining questions in Section Two.]

10. Would Defendant have discharged Plaintiff from employment even if Defendant had not taken Plaintiff's religion into account?

Answer Yes or No

[Note: If your answer is "Yes," you need not answer the remaining questions in Section Two.]

11. Should Plaintiff be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No

12. Should Plaintiff be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No

13. Should punitive damages be assessed against Defendant?

Answer Yes or No _____

Section Three: Retaliation

Do you find from a preponderance of the evidence:

14. Did Plaintiff engage in protected activity?

Answer Yes or No

Yes

[Note: If your answer is "No," you need not answer the remaining questions in Section Three.]

15. Did Defendant terminate Plaintiff because she engaged in protected activity?

Answer Yes or No

~~No~~ Yes

[Note: If your answer is "No," you need not answer the remaining questions in Section Three.]

16. Did Plaintiff suffer damages because of her termination?

Answer Yes or No

Yes

[Note: If your answer is "No," you need not answer the remaining questions in Section Three.]

17. Should Plaintiff be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No

Yes

18. Should Plaintiff be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No

Yes

19. Should punitive damages be assessed against Defendant?

Answer Yes or No Yes.

Section Four: Damages

Do you find from a preponderance of the evidence:

20. If you have found that the Plaintiff should be awarded damages to compensate for lost wages and benefits, please enter the amount of back pay damages she should be awarded:

\$ 36,000.00

21. If you find that Plaintiff should be awarded damages to compensate for emotional pain and mental anguish, please enter the amount of money you award her:

\$ 500,000.00

If you awarded damages in response to Question Nos. 20 and 21 (or both), go to the next question.

22. If you find that punitive damages should be assessed against the Defendant, please enter the amount of money you assess against the Defendant:

\$ ~~25,000,000.00~~
21,000,000.00

Please sign and date the verdict form.

SO SAY WE ALL.

DATE: ~~04/11/2019~~
01/14/2019

Foreperson's Signature