

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

JOHNNY TAYLOR
VERSUS
UNION PACIFIC

CIVIL ACTION
NUMBER 18-1110-SDD-EWD

JURY VERDICT FORM

1(a). Did Plaintiff Johnny Taylor prove by a preponderance of the evidence that he engaged in protected activity under the Federal Railroad Safety Act?

Answer Yes or No: Yes

[If your answer is Yes, go to Question 1(b).]

[If your answer is No, DO NOT ANSWER ANY REMAINING QUESTIONS, AND SIGN THE LAST PAGE.]

1(b). Did Plaintiff Johnny Taylor prove by a preponderance of the evidence that his protected activity was a contributing factor to Defendant Union Pacific's decision to terminate him?

Answer Yes or No: Yes

[If your answer is Yes, go to Question 1(c).]

[If your answer is No, DO NOT ANSWER ANY REMAINING QUESTIONS, AND SIGN THE LAST PAGE.]

1(c). Did Union Pacific prove by clear and convincing evidence that it would have terminated Plaintiff Johnny Taylor even if he had not engaged in protected activity?

Answer Yes or No: No

[If your answer is Yes, DO NOT ANSWER ANY REMAINING QUESTIONS, AND SIGN THE LAST PAGE.]

[If your answer is No, go to Question 2.]

(continued on next page)

2(a). Do you find that Plaintiff Johnny Taylor should be awarded back pay?

Answer Yes or No: Yes

[Go to Question 2(b).]

2(b). What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiff Johnny Taylor for the damages, if any, you have found Defendant Union Pacific caused him?

Past pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life:

\$ 300,000

Future pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life:

\$ 423,000

[Go to Question 2(c).]

2(c). Do you find that Plaintiff Johnny Taylor should be awarded punitive damages?

Answer Yes or No: No

[If your answer is Yes, go to Question 2(d).]

[If your answer is No, DO NOT ANSWER ANY REMAINING QUESTIONS, AND SIGN THE BOTTOM OF THIS PAGE.]

2(d). What sum of money should be assessed against Defendant Union Pacific as punitive damages?

\$ _____

SO SAY WE ALL.

Brianna Ensminger
FOREPERSON

11-4-2021
DATE