

SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN FRANCISCO

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Case Number: CGC-10-501947

Filing Date: Oct-21-2011 3:20

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JURY VERDICT

LUCILLE M. WINSTON VS. VICTORIA'S SECRET DIRECT, LLC et al

001C03360752

Instructions: Please place this sheet on top of the document to be scanned.

1.14 		
1 2 3 4 5 6 7 8 9 10 11 12 13 14	OPERATIONAL IN THE SUPERIOR COURT OF T COUNTY OF SA Lucille M. Winston, Plaintiff, v. AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP and DOES 1 through 10, inclusive	
15 16	Washington, Stonestown Shopping Center, LP	
17 18 19 20 21	We answer the questions submitted to us as follow 1. Was Pierre Washington negligent? VesNo	- vs:
22 23 24 25	If your answer to question 1 is yes, then answer questions on this form, and have the pro- 2. Was Pierre Washington's negligence a sub- Winston?	esiding juror sign and date this form.
26 27 28	If your answer to question 2 is yes, then answer questions on this form, and have the pro- 3. What are Lucille Winston's damages?	uestion 3. If you answered no, stop here, answer esiding juror sign and date this form.
	Verdict Form VF	400 Negligence

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\$<u>4938.11</u> <u>\$165,000</u> \$<u>85,000</u> a. Past economic loss: Medical Expenses a. Last economic loss. Medical Expenses
b. Past noneconomic loss (including physical pain and mental suffering.)
c. Future noneconomic loss (including physical pain And mental suffering.) Signed: Only Much Dated: 10/21/2011 After all verdict forms have been signed, deliver this verdict form to the bailiff. Verdict Form VF 400 Negligence D

VF-1301 Battery--Self-Defense/Defense of Others at Issue

We answer the questions submitted to us as follows:

1. Did Allied Best and the second of the Pierre Washington touch Liucille Winston or cause Lucille Winston to be touched with the intent to harm or offend her?

<u>Fyes</u> <u>S</u>No <u>Noanswer</u>

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Lucille Winston consent to be touched?

Yes No

If your answer to question 2 is no, then answer question 3. If you answered yes, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Was Lucille Winston harmed or offended by the conduct of Association Strengton Pierre Washington

_____Yes _____No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Would a reasonable person in Lucille Winston's situation have been offended by the touching?

Yes No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.]

5. Did A Berne Washington reasonably believe that Lucille Winston was going to harm Pierre Washington Or any other person?

Yes No

If your answer to question 5 is yes, then answer question 6. If you answered no, skip question 6 and answer question 7.

6. Did Allied Barton, Stonestown Mall or Pierre Washington use only the amount of force that was reasonably necessary to protect Pierer Washington Dr awy other person?

_____Yes _____No

If your answer to question 6 is no, then answer question 7. If you answered yes, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Lucille Winston's damages? a. Past economic loss: Medical Expensesb. Past noneconomic loss (including physical pain \$ and mental suffering.) c. Future noneconomic loss (including physical pain And mental suffering.) \$ \$ Presiding Juror Signed: (Dated: 10/21/2011 After all verdict forms have been signed, deliver this verdict form to the bailiff. VERDICT FORM VF 1300 -- BATTERY D

1	CACI VF-1404. FALSE ARREST WITHOUT WARRANT BY PRIVATE CITIZEN-		
2	-AFFIRMATIVE DEFENSEPROBABLE CAUSE TO ARREST		
3			
4	We answer the questions submitted to us as follows:		
5	1. Did Pierre Washington intentionally cause Lucille Winston to be arrested		
6	without a warrant?		
7	Yes No		
8	If your answer to question 1 is yes, then answer question 2. If you answered		
9	no, stop here, answer no further questions, and have the presiding juror sign and date this form.		
10	2. Did Lucille Winston commit or attempt to commit a crime in Pierre		
11	Washington's presence?		
12	$\underline{\qquad}$ Yes $\underline{\checkmark}$ No		
13	If your answer to question 2 is no, then answer question 3. If you answered		
14	yes, stop here, answer no further questions, and have the presiding juror sign and date this form.		
15	3. Was Pierre Washington's conduct a substantial factor in causing harm to		
16			
17	Yes No		
18	If your answer to question 3 is yes, then answer question 4. If you answered		
19	no, stop here, answer no further questions, and have the presiding juror sign and date this form.		
20	4. What are Lucille Winston's damages?		
21	a. Past economic loss		
22	medical expenses \$		
23			
24	Total Past Economic Damages: \$ 4638.11		
25	b. Future economic loss		
26	pain and suffering \$		
27			
28	Total Future Economic Damages \$ \$5,000		

Page 1 of 2

DEFENDANTS' REQUESTED JURY INSTRUCTIONS

1	
2	c. Past noneconomic loss, including
3	emotional distress
4	\$ <u>165,00</u> 0
5	
6	TOTAL
7	\$ 254,938.11
8	
9	
10	Signed: Gli/MM
11	Presiding Juror
12	
13	Dated: $10/21/2011$
14	
15	After it has been signed/After all verdict forms have been signed, deliver this verdict
16	form to the clerk/bailiff/judge
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8	IN THE SUPERIOR COURT OF 7		
9	COUNTY OF SA	N FRANCISCO	
10			
11	Lucille M. Winston,	CASE NO. CGC 10-501947	
12	Plaintiff,	Verdict Form VF 1407 False Imprisonment—	
13	v.	Unnecessary Delay in Processing/Releasing	
14	AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP		
15	and DOES 1 through 10, inclusive		
16	Defendants.		
17			
18			
19	We arrest the exections submitted to us as follow		
20	We answer the questions submitted to us as follow		
21	1. Did Pierre Washington hold Lucille Winston in custody?		
22	V_{Yes} No		
23	If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form.		
24	2. Was there an unnecessary delay in releasing Lucille Winston?		
25	Ves No		
26	If your answer to question 2 is yes, then answer questions on this form, and have the pre-	testion 3. If you answered no, stop here, answer esiding juror sign and date this form.	
27	no further questions on this form, and have the presiding juror sign and date this form.		
28	Yes <u>No</u>		
	Verdict Form VF 1407 False Imprisonment	-Unnecessary Delay in Processing/Releasing	

1 If your answer to question 3 is no, then answer question 4. If you answered yes, stop here, answer no further questions on this form, and have the presiding juror sign and date this form. 2 3 4. Was Pierre Washington's conduct a substantial factor in causing harm to Lucille 4 Washington? 5 VYes No If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer 6 no further questions on this form, and have the presiding juror sign and date this form. 7 5. What are Lucille Winston's damages? 8 \$ 4938.11 Past economic loss: Medical Expenses a. 9 b. Past noneconomic loss (including physical pain \$_165,000 \$_85,000 and mental suffering.) c. Future noneconomic loss (including physical pain 10 And mental suffering.) 11 12 Presiding Juror Signed: 13 Dated: 10/21/2011 14 15 After all verdict forms have been signed, deliver this verdict form to the bailiff. 16 17 18 19 2021 22 23 24 25 26 27 28 2 Verdict Form VF 1407 False Imprisonment-Unnecessary Delay in Processing/Releasing

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8	IN THE SUPERIOR COURT OF 1	THE STATE OF CALIFORNIA	
9	COUNTY OF SA	N FRANCISCO	
10			
11	Lucille M. Winston,	CASE NO. CGC 10-501947	
12	Plaintiff,	Verdict Form VF 1600 Intentional Infliction of	
13	v.	Emotional Distress	
14	AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP and DOES 1 through 10, inclusive		
15	Defendants.		
16	Detendants.		
17			
18			
19 20	We answer the questions submitted to us as follow	/s:	
21	1. Was Pierre Washington's conduct outraged	ous?	
22	YesNo		
23	If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form.		
24	2. Did Pierre Washington's conduct intend to	cause Lucille Winston emotional distress or did	
25	Pierre Washington act with reckless disreg would suffer emotional distress, knowing t conduct occurred?	hat Lucille Winston was present when the	
26 27	Yes No		
28	If your answer to question 2 is yes, then answer que no further questions on this form, and have the pre-	testion 3. If you answered no, stop here, answer siding juror sign and date this form.	
	Verdict Form VF 1600 Intentiona	l Infliction of Emotional Distress	

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1 3. Did Lucille Washington suffer severe emotional distress? 2 No Yes 3 If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form. 4 4. Was Pierre Washington's conduct a substantial factor in causing Lucille Washington's 5 severe emotional distress? - Yes - NO 6 If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form. 7 8 5. What are Lucille Winston's damages? 9 \$ a. Past economic loss: Medical Expenses 10 b. Past noneconomic loss (including physical pain \$ and mental suffering.) 11 c. Future noneconomic loss (including physical pain \$ And mental suffering.) 12 13 Signed: GeliAMMA 14 15 Dated: 10/21/2011 16 After all verdict forms have been signed, deliver this verdict form to the bailiff. 17 18 19 20 21 22 23 24 25 26 27 28 2 Verdict Form VF 1600 Intentional Infliction of Emotional Distress D

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	8	IN THE SUPERIOR COURT OF	THE STATE OF CALIFORNIA	
	9	COUNTY OF SA	N FRANCISCO	
	10			
	11	Lucille M. Winston,	CASE NO. CGC 10-501947	
	12	Plaintiff,		
	13	v.	Verdict Form VF 1603 Negligent Infliction of Emotional Distress—Direct Victim	
	14	AlliedBarton Security Services, LP, Pierre		
	15	Washington, Stonestown Shopping Center, LP and DOES 1 through 10, inclusive		
	16	Defendants.		
	17			
	18			
	19			
	20	We answer the questions submitted to us as follows:		
	21	1. Was Pierre Washington Negligent?		
	22	V Yes No		
	23	If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form.		
	24	2. Did Lucille Winston suffer serious emotion	nal distress?	
	25	Yes No		
	26	If your answer to question 2 is no, then answer que	estion 3. If you answered yes, stop here, answer	
	27	no further questions on this form, and have the pre		
	28	3. Was Pierre Washington's negligence a sub serious emotional distress?	stantial factor in causing Lucifie winston's	
		Verdict Form VF 1603 Negligent Inflictio	n of Emotional Distress—Direct Victim	

Yes No If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form. 4. What are Lucille Winston's damages? a. Past economic loss: Medical Expenses \$ 4938.11 b. Past noneconomic loss (including physical pain \$<u>165,000</u> \$<u>85,000</u> and mental suffering.) c. Future noneconomic loss (including physical pain And mental suffering.) iding Juror Signed: Dated: (0/21/2011 After all verdict forms have been signed, deliver this verdict form to the bailiff. Verdict Form VF 1603 Negligent Infliction of Emotional Distress-Direct Victim D

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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA	
9 COUNTY OF SAN FRANCISCO	
10	
11Lucille M. Winston,CASE NO. CGC 10-501947	
12 Plaintiff, Verdict Form VF 3900 Punitive I	Damages
13 V.	U
 AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP and DOES 1 through 10, inclusive 	
15 and DOES I through 10, inclusive Defendants.	
16	
17	
18	
19 We answer the question submitted to us as follows:	9
 20 1. Did Pierre Washington engage in the conduct with malice, oppression, or fraud Yes No 	4
 22 23 Signed: <u>Alpha Markov</u> 24 Dated: <u>10/21/2011</u> 25 26 After all verdict forms have been signed, deliver this verdict form to the bailiff. 	
Presiding Juror	
24 Dated: $10/21/2011$ 25	
26 After all verdict forms have been signed, deliver this verdict form to the bailiff.	
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Verdict Form 3900 Punitive Damages	

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8	IN THE SUPERIOR COURT OF T	ΓΗΕ STATE OF CALIFORNIA	
9	COUNTY OF SA	N FRANCISCO	
10			
11	Lucille M. Winston,	CASE NO. CGC 10-501947	
12	Plaintiff,	Variat Form VE 2001 Dunitive Damages	
13	v.	Verdict Form VF 3901 Punitive Damages Against Employer	
14	AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP		
15	and DOES 1 through 10, inclusive		
16	Defendants.		
17			
18			
19	We answer the questions submitted to us as follow		
20	1. Did Pierre Washington engage in the condu	uct with malice, oppression, or fraud?	
21	Yes <u>V</u> No		
22	If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form.		
23	2. Was Pierre Washington an officer, director behalf of AlliedBarton?	, or managing agent of AlliedBarton acting on	
24 25	Yes No		
26	Signed: Dil Multo Presiding Juror		
27	Dated: $\frac{10/21/2011}{2011}$		
28	After all verdict forms have been signed, deliver th	nis verdict form to the bailiff.	

Verdict Form 3901 Punitive Damages Against Employer

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7	IN THE SUPERIOR COURT OF	THE STATE OF CALIFORNIA	
8	COUNTY OF SA	N FRANCISCO	
9			
10	Lucille M. Winston,	CASE NO. CGC 10-501947	
11	Plaintiff,		
12	V.	Verdict Form VF 3903 Punitive Damages— Entity DefendantRatification	
13	AlliedBarton Security Services, LP, Pierre		
14	Washington, Stonestown Shopping Center, LP and DOES 1 through 10, inclusive		
15	Defendants.		
16			
17			
18	We answer the questions submitted to us as follows:		
19	1. Did an agent or employee of AlliedBarton engage in the conduct with malice, oppression, or fraud?		
20	Yes V No		
21		pestion 2. If you answered no stop here answer	
22	If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this form, and have the presiding juror sign and date this form.		
23	2. Did one or more officers, directors, or managing agents of AlliedBarton know of this conduct and adopt or approve it after it occurred?		
24	Yes No		
25			
26	Signed: <u>Fresiding Juror</u>		
27 28	Dated: <u>10/21/20()</u> After all verdict forms have been signed, deliver th	nis verdict form to the bailiff.	
	Verdict Form VF 3903 Punitive Dama		

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	IN THE SUPERIOR COURT OF	THE STATE OF CALIFORNIA
	COUNTY OF SA	AN FRANCISCO
(
10	Lucille M. Winston,	CASE NO. CGC 10-501947
1	Plaintiff,	Verdict Form VF 3700—Vicarious Liability
12	V.	AlliedBarton
13	AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP and DOES 1 through 10, inclusive	
14		
1:	Defendants.	
10		
1'		
18 We answer the questions submitted to us as follows:		
1		nployee of agent?
20 2	If your answer to question 1 is yes, then answer to $\frac{1}{1}$	uestion 2. If you answered no stop here answer
2	no further questions on this form, and have the pr	
2.	2. Was Pierre Washington acting within the scope of his agency or employment when he	
2		
2		
2	Signed: Juli MM	
2	Dated: $\frac{10/21/2011}{2011}$ After all verdict forms have been signed, deliver	this verdict form to the bailiff
2		
		carious Liability AlliedBarton

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7	IN THE SUPERIOR COURT OF	THE STATE OF CALIFORNIA	
8		AN FRANCISCO	
9			
0	Lucille M. Winston,	CASE NO. CGC 10-501947	
	Plaintiff,		
1		Verdict Form VF 3700—Vicarious Liability	
2	V.	Stonestown	
3	AlliedBarton Security Services, LP, Pierre Washington, Stonestown Shopping Center, LP		
4	and DOES 1 through 10, inclusive Defendants.		
5	Defendants.		
6			
7			
8	We answer the questions submitted to us as follow	,	
9	1. Was Pierre Washington Stonestown Shop	ping Center's employee or agent?	
0	V_{Yes} No		
1	If your answer to question 1 is yes, then answer q no further questions on this form, and have the pr		
2			
3	2. Was Pierre Washington acting within the scope of his agency or employment when he harmed Lucille Winston?		
4	Yes No		
25	. DAIMIA		
.6	Signed: Presiding Juror		
27	Dated: $\frac{10/21}{4201}$ After all verdict forms have been signed, deliver t	this verdict form to the bailiff	
28			

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8	SUPERIOR COURT - ST	ATE OF CALIFORNIA	
9	SAN FRANCISCO - UNLI	MITED JURISDICTION	
10	LUCILLE M. WINSTON,	CASE NO. CGC 10-501947	
11	Plaintiff,		
12	ν.	[PROPOSED] JUDGMENT ON JURY	
13	VICTORIA'S SECRET DIRECT, LLC,	VERDICT	
14	GENERAL GROWTH PROPERTIES, INC, ALLIEDBARTON SECURITY SERVICES,	Trial Date: October 11, 2011	
15	LLC, PIERRE WASHINGTON, APRIL DOE, and DOES 1 through 10, inclusive	Department: 624	
16	Defendants.	Honorable Judge Arnold Roscafield	
17			
18			
19			
20			
21	This Action came on regularly for trial on C	October 11, 2011, in dept 624 of the Superior	
22	Court, The Honorable Judge Arnold Rosenfield, presiding; the Plaintiff Lucille M. Winston		
23	appearing by attorneys John Fitzpatrick Vannucci Esq. of the Law Offices of John F tzpatrick		
24	Vannucci, and Wykeisha Orr of the Orr Firm. The Defendants Pierre Washington, AlliedBarton		
25			
26	Security Services LLC. and General Growth Properties INC., dba Stonestown Shop; ing Center		
27	LP., appearing by their attorneys Lenore Cabreros Kelly and Ronald S. Bushner. of Wilson,		
28	Elser, Moskowitz, Edelman & Dicker LLP.		
	[PROPOSED] JUDGMEN	IT ON JURY VERDICT	
		ORIGINAL	

1	A Jury of 12 Persons with two alternates was regularly impaneled and sworn. Witnesses were			
2	sworn and testified. After hearing the evidence and arguments of counsel, the jury was duly			
3				
4	instructed by the Court and the cause was submitted to the jury. The Jury deliberated and			
5	thereafter returned to the Court with the following special verdicts:			
6				
7	Special Verdict Form VF-400-Negligence			
8	1. Was Pierre Washington Negligent?			
9	<u>X_</u> YesNo			
10	2. Was Pierre Washington's negligence a substantial factor in causing harm to Lucille M.			
11	Winston?			
12	<u>X_</u> YesNo			
13				
14	3. What are Lucille M. Winston's damages?			
15	a. Past economic loss: Medical Expenses \$4,938.11			
16	b. Past noneconomic loss (including physical pain and mental suffering.) \$165,000.00			
17	c. Future noneconomic loss (including physical pain			
18	And mental suffering.) \$ 85,000.00			
19				
20				
21	Special Verdict VF 1404-False Arrest Without Warrant By Private Citizen-Affirmative Defense – Probable Cause to Arrest			
22 23				
23	1. Did Pierre Washington intentionally cause Lucille Winston to be arrested without a warrant?			
25	X Ves No			
26	<u>X_</u> YesNo			
27	2. Did Lucille Winston Commit or attempt to commit a crime in Pierre Washington's presence?			
28				
	<u>Yes X No</u>			
	[PROPOSED] JUDGMENT ON JURY VERDICT			

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1	3. Was Pierre Washington's conduct a substantial factor in causing harm to Lucille
2	Winston? <u>X_</u> YesNo
3	
4	4. What are Lucille M. Winston's damages?
5	a. Past economic loss: Medical Expenses \$4,938.11
6	b. Future noneconomic loss (including physical pain And mental suffering.) \$ <u>85,000.00</u>
7	c. Past noneconomic loss (including physical pain
8	and mental suffering.) \$165,000.00
9 10	TOTAL: \$ <u>254,938.11</u>
11	
12	Special Verdict Form VF 1407-False Imprisonment—Unnecessary Delay in
13	Processing/Releasing
14	I. Did Pierre Washington hold Lucille Winston in custody?
15	X_YesNo
16	
17	2. Was there an unnecessary delay in releasing Lucille Winston?
18	X_YesNo
19	3. Did Lucille M. Winston consent to the delay?
20	Yes <u>X</u> _No
21	
22	4. Was Pierre Washington's conduct a substantial factor in causing harm to Lucille Washington?
23 24	<u>X_Yes</u> No
25	
26	5. What are Lucille M. Winston's damages?
27	
28	a. Past economic loss: Medical Expenses\$4.938.11b. Past noneconomic loss (including physical pain
	[PROPOSED] JUDGMENT ON JURY VERDICT

1 2 3 4	and mental suffering.) c. Future noneconomic loss (including physical pain And mental suffering.)	\$ <u>165,000.00</u> \$ <u>85,000.00</u>
5 6 7 8	Verdict Form VF 1600 Intentional Infliction of Emotional Distres 1. Was Pierre Washington's conduct outrageous? Yes X_No	S
9 10 11 12	2. Did Pierre Washington's conduct intend to cause Lucille V Pierre Washington act with reckless disregard of the probability the emotional distress, knowing that Lucille Winston was present whe YesNo	at Lucille Winston would suffer
13	3. Did Lucille Washington suffer severe emotional distress?	
14	YesNo	
15 16	4. Was Pierre Washington's conduct a substantial factor in causing Lucille Washington's severe emotional distress?	
17 18	5. What are Lucille M. Winston's damages?	
19	a. Past economic loss: Medical Expensesb. Past noneconomic loss (including physical pain	\$
20	and mental suffering.)	\$
21	c. Future noneconomic loss (including physical pain And mental suffering.)	¢
22	And mental surrening.)	\$
23		
24		
25	Special Verdict Form VF 1603 Negligent Infliction of Emotional	Distress—Direct Victim
26	1. Was Pierre Washington Negligent?	
27	<u>X_YesNo</u>	
28		
	[PROPOSED] JUDGMENT ON JURY VER	

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1	2.	Did Lucille Winston suffer serious emotional distress?	
2		<u>X_</u> YesNo	
3			
4	3.	Was Pierre Washington's negligence a substantial factor serious emotional distress?	in causing Lucille Winston's
5			
6	ļ	<u>X_</u> YesNo	
7			
8	4.	What are Lucille M. Winston's damages?	
9	1	Past economic loss: Medical Expenses	\$ <u>4,938.11</u>
10		Past noneconomic loss (including physical pain and mental suffering.)	\$ <u>165,000.00</u>
П	с.	Future noneconomic loss (including physical pain And mental suffering.)	\$ <u>85,00</u> 0.00
12		And mental surfering.)	3 <u>85,000.00</u>
13			
14	Specia	I Verdict Form VF 3700—Vicarious Liability AlliedBarto	n
15	1	Was Pierre Washington AlliedBarton's employee or agen	
16		X_YesNo	
17			
18	2.	Was Pierre Washington acting within the scope of his age harmed Lucille Winston?	ency or employment when he
19		<u>X_</u> YesNo	
20 21			
22			
23	Specia	I Verdict Form VF 3700—Vicarious Liability Stonestown	
24	1	Was Dierre Washington Stonestown Shonning Conter's a	
25	1.	Was Pierre Washington Stonestown Shopping Center's en	mployee or agent?
26		<u>X_YesNo</u>	
27	2.	Was Pierre Washington acting within the scope of his age harmed Lucille Winston?	ency or employment when he
28		X Yes No	
	~~~~ ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	X_YesNo	
		(PROPOSED) JUDGMENT ON JURY VEI	

1	Special Verdict Form VF 3900 Punitive Damages- Individual
2	1. Did Pierre Washington engage in the conduct with malice, oppression, or fraud?
3	Yes X_No
4	
5	
6 7	
8	Special Verdict Form VF 3901 Punitive Damages Against Employer
9	1. Did Pierre Washington engage in the conduct with malice, oppression, or fraud?
10	Yes <u>X</u> No
11	2. Was Pierre Washington an officer, director, or managing agent of AlliedBarton acting on
12	behalf of AlliedBarton? Yes No
13 14	
15	
16	
17	Special Verdict Form VF 3903 Punitive Damages—Entity DefendantRatification
18	1. Did an agent or employee of AlliedBarton engage in the conduct with malice, oppression,
19	or fraud?
20	Yes X_No
21 22	2. Did one or more officers, directors, or managing agents of AlliedBarton know of this
22	conduct and adopt or approve it after it occurred?
24	YesNo
25	
26	
27	It appearing by reason of those special verdicts that: Plaintiff Lucille M. Winston is
28	entitled to judgment against Defendant Pierre Washington and Defendant AlliedBarton Security
	6 [[PROPOSED] JUDGMENT ON JURY VERDICT

Services LLC. and Defendant General Growth Properties INC., dba Stonestown Shopping Center LP..

3	NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that Plaintiff			
4				
5	Lucille M. Winston shall recover from Defendants Pierre Washington, AlliedBarton Security			
6	Services LLC. and General Growth Properties INC., dba Stonestown Shopping Center LP			
7	jointly and severally, \$165,000.00 (one hundred sixty five thousand dollars) in past noneconomic			
8	damages, jointly and severally, \$85,000.00 (eighty five thousand dollars) in future noneconomic			
9	damages and jointly and severally, \$4,938.11 (four thousand nine hundred thirty eight dollars and			
10 11	eleven cents) in past economic damages totaling the sum of \$ 254,938.11 (two hundred fifty four			
12	thousand, nine hundred thirty eight dollars and eleven cents) jointly and severally from			
13	defendants Pierre Washington, AlliedBarton Security Services LLC. and General Growth			
14	Properties INC., dba Stonestown Shopping Center LP., with interest thereon at the rate OF TEN			
15	PERCENT (10%) per annum from the date of the entry of this judgment until paid, together with			
16	statutory costs in an amount to be determined as to Defendant Pierre Washington and Defendant			
17	AlliedBarton Security Services LLC., and Defendant General Growth Properties INC., dba			
18				
19	Stonestown Shopping Center LP., as provided by law, in accordance with cost bills, motions or			
20	further order of this Court.			
21				
22	Dated: 12-1-16			
23				
24	HONORABLE ARNOLD ROSENELELD			
25	JUDGE OF THE SUPERIOR COURT			
26				
27				
28				
	[PROPOSED] JUDGMENT ON JURY VERDICT			