

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cv-23497-BLOOM/Torres

JANE DOE,

Plaintiff,

v.

MIAMI GARDENS SQUARE ONE, INC.,
individually and d/b/a TOOTSIE'S
CABARET MIAMI,

Defendant.

_____ /

VERDICT FORM

Employee or Independent Contractor

SPECIAL INTERROGATORIES TO THE JURY

Do you find from a preponderance of the evidence:

1. That Jane Doe was an employee of Tootsie's?

Answer Yes or No NO

If your answer is "No," please go to page 4. If your answer is "Yes," go to the next
verdict form.

SO SAY WE ALL.



Foreperson's Signature

DATE: 02/03/2024

Title VII – Civil Rights Act – Gender Discrimination – Hostile Work Environment

SPECIAL INTERROGATORIES TO THE JURY

Do you find from a preponderance of the evidence:

1. That club patrons harassed Jane Doe because of her sex?

Answer Yes or No _____

If your answer is “No,” please go to page 4. If your answer is “Yes,” go to the next question.

2. That the harassment created a hostile work environment for Jane Doe?

Answer Yes or No _____

If your answer is “No,” please go to page 4. If your answer is “Yes,” go to the next question.

3. That Jane Doe’s supervisor knew, or in the exercise of reasonable care should have known, about the hostile work environment?

Answer Yes or No _____

If your answer is “No,” please go to page 4. If your answer is “Yes,” go to the next question.

4. That Tootsie’s exercised reasonable care to prevent and correct promptly any allegedly harassing behavior.

Answer Yes or No _____

If your answer is “Yes,” please go to page 4. If your answer is “No,” go to the next question.

5. That Jane Doe failed to take advantage of any preventative or corrective opportunities provided by Defendant.

Answer Yes or No _____

If your answer is "Yes," please go to page 4. If your answer is "No," go to the next question.

6. That Jane Doe suffered damages because of the hostile work environment?

Answer Yes or No _____

Please go to the next verdict form.

SO SAY WE ALL.

Foreperson's Signature

DATE: _____

Negligence

SPECIAL INTERROGATORIES TO THE JURY

Do you find from a preponderance of the evidence:

1. Was there negligence on the part of Tootsie's which was a legal cause of injury to Jane Doe?

Answer Yes or No

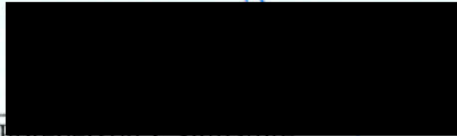
NO

If your answer is "No," please go to page 5. If your answer is "Yes," go to the next question.

Please go to the next verdict form.

SO SAY WE ALL.

DATE: 02/03/2024


Foreperson's Signature

Damages

SPECIAL INTERROGATORIES TO THE JURY

1. That Jane Doe should be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

2. That Jane Doe should be awarded damages to compensate for humiliation and injury to reputation?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

3. That Jane Doe should be awarded damages to compensate for loss of enjoyment of life?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

4. That Jane Doe should be awarded damages to compensate for inconvenience?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

Total of Damages: \$ _____

SO SAY WE ALL.

DATE: _____

Foreperson's Signature