

FILED

FEB 20 2013

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY SM
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

AMBER IBARRA

Plaintiff

v.

UNITED PARCEL SERVICE, INC.
(OHIO)

Defendant

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No. MO-10-CA-113

VERDICT ON SPECIAL INTERROGATORIES

We, the jury, unanimously answer the interrogatories submitted by the Court as follows:

Interrogatory No. One

Do you find from a preponderance of the evidence that Defendant United Parcel Service terminated the employment of Plaintiff Amber Ibarra because of her sex?

Please answer "Yes" or "No."

We answer: Yes

Please proceed to answer Interrogatory No. Two.

Interrogatory No. Two

Do you find from a preponderance of the evidence that the Defendant failed to reinstate the Plaintiff because of her sex?

Please answer "Yes" or "No."

We answer: Yes

If you have answered "yes" to either Interrogatory No. One or Interrogatory No. Two, then please proceed to answer Interrogatory Nos. Three, Four, and Five. If you have answered "no" as to both interrogatories, then do not answer the remaining interrogatories.

Interrogatory No. Three

Do you find from a preponderance of the evidence that even if Amber Ibarra had not been discharged on July 6, 2009, Defendant United Parcel Service would have terminated her employment no later than March 10, 2011, because she removed and copied employment records of other employees without authorization?

Please answer "Yes" or "No."

We answer:

NO

Interrogatory No. Four

What amount of money, if paid now in cash, would fairly and reasonably compensate Plaintiff Amber Ibarra for the injuries, if any, caused by the Defendant's discriminatory actions?

Please answer in dollars and cents or "None" as to each element.

We answer:

a. Economic loss, including back pay and benefits:

\$ 150,000

b. Mental anguish and emotional distress:

\$ 150,000 JAP

If you have awarded money damages in response to Interrogatory No. Four, then please answer Interrogatory No. Five.

Interrogatory No. Five

Do you find from a preponderance of the evidence that Defendant United Parcel Service acted with malice or reckless indifference to the right of Plaintiff Amber Ibarra to be free from intentional discrimination?

Please answer "Yes" or "No."

We answer: 300,000

if you have answered "yes" to Interrogatory No. Five, then please answer Interrogatory No. Six.

Interrogatory No. Six

What amount of money, if any, do you award Plaintiff Amber Ibarra as punitive damages?

Please answer in dollars and cents or "None."

We answer: \$ 300,000

2/20/13
Date

Foreperson
Original Signed by Jury
Foreperson