

If you answered Yes to any or both Questions No. 2 and 3, then please proceed to question No. 4. If you answered No to both questions 2 and 3, then proceed to Question No. 8.

4. Do you find by a preponderance of the evidence that Plaintiff was constructively discharged from her employment.

Yes X No _____

If you answered Yes, then proceed to question No. 7. If you answered No, the proceed to Question No. 5.

5. Do you find by a preponderance of the evidence that Defendants exercised reasonable care to prevent and correct promptly any sexually harassing behavior?

Yes _____ No _____

If you answered No, then proceed to question No. 7. If you answered Yes, then proceed to questions No. 6.

6. Do you find by a preponderance of the evidence that the Plaintiff employee unreasonably failed to take advantage of any preventative or corrective opportunities provided by the employer or that the employee unreasonably failed to otherwise avoid harm.

Yes _____ No _____

If you answered No, then proceed to Question No. 7. If you answered yes on both Questions No. 5 and 6, then proceed to Question No. 8.

7. If you answered "Yes" to one or both questions No. 2 or 3 on the claims for sex discrimination in the form of quid pro quo sexual harassment or sex discrimination in the form of a sexually hostile work environment against the Defendants, please state the amount, if any, of damages for these claims as follows:

Back pay: \$ 21,132
Compensatory Damages: \$ 100,000

Please proceed to question No. 8.

8. Do you find that the Plaintiff has carried her burden of proof by a preponderance of the evidence on all the elements of her claim for intentional infliction of emotional distress against Knoxville Harley-Davidson, Inc.

Yes X

No _____

If you answered Yes, then Proceed to question No. 9. If you answered No, then turn in your verdict form to the Court.

9. If you answered "Yes" to question No. 8 on the claim for intentional infliction of emotional distress against Knoxville Harley-Davidson, Inc., state the amount, if any, of damages for this claim:

Economic Damages: \$ 100,000.00
Noneconomic Damages: \$ 500,000.00

Please proceed to question No. 10.

10. If you awarded damages in response to question No. 9 on the claim for intentional infliction of emotional distress against Knoxville Harley-Davidson, Inc., do you find that the plaintiff has carried her burden of proof by clear and convincing proof that she is entitled to punitive damages?

Yes X

No _____

ONLY COMPLETE THE BELOW SECTION IF THE ANSWER TO NO. 1 WAS NO

11. Do you find that the Plaintiff has carried her burden of proof by a preponderance of the evidence on all the elements of her claim for sex discrimination in the form of quid pro quo sexual harassment against Defendant Knoxville Harley-Davidson Inc.

Yes _____

No _____

Please proceed to question No. 12.

12. Do you find that the Plaintiff has carried her burden of proof by a preponderance of the evidence on all the elements of her claim for sex discrimination in the form of a sexually hostile work environment against Defendant Knoxville Harley-Davidson Inc.

Yes _____

No _____

Please proceed to question No. 13.

13. Do you find by a preponderance of the evidence that Plaintiff was constructively discharged from her employment at Knoxville Harley Davidson Inc.

Yes _____ No _____

If you answered Yes, then proceed to question No. 16. If you answered No, the proceed to Question No. 14.

14. Do you find by a preponderance of the evidence that Knoxville Harley Davidson exercised reasonable care to prevent and correct promptly any sexually harassing behavior?

Yes _____ No _____

If you answered No, then proceed to question No. 16. If you answered Yes, then proceed to question No. 15.

15. Do you find by a preponderance of the evidence that the Plaintiff employee unreasonably failed to take advantage of any preventative or corrective opportunities provided by the employer or that the employee unreasonably failed to otherwise avoid harm.

Yes _____ No _____

If you answered No, then proceed to Question No. 16. If you answered yes on both Questions No. 14 and 15, then proceed to Question No. 17.

16. If you answered "Yes" to one or both questions No. 11 or 12 on the claims for sex discrimination in the form of quid pro quo sexual harassment or sex discrimination in the form of a sexually hostile work environment against Knoxville Harley Davidson, Inc., please state the amount, if any, of damages for these claims as follows:

Back pay: \$ _____
Compensatory Damages: \$ _____

Please proceed to question No. 17.

17. Do you find that the Plaintiff has carried her burden of proof by a preponderance of the evidence on all the elements of her claim for intentional infliction of emotional distress against Knoxville Harley-Davidson, Inc.

Yes _____ No _____

If you answered Yes, then Proceed to question No. 18. If you answered No, then proceed to question No. 20.

18. If you answered "Yes" to question No. 17 on the claim for intentional infliction of emotional distress against Knoxville Harley-Davidson, Inc., state the amount, if any, of damages for this claim:

Economic Damages: \$ _____

Noneconomic Damages: \$ _____

Please proceed to question No. 19.

19. If you awarded damages in response to question No. 18 on the claim for intentional infliction of emotional distress against Knoxville Harley-Davidson, Inc., do you find that the plaintiff has carried her burden of proof by clear and convincing proof that she is entitled to punitive damages?

Yes _____

No _____

Please proceed to question No. 20.

20. Do you find that the Plaintiff has carried her burden of proof by a preponderance of the evidence on all the elements of her claim for sex discrimination in the form of quid pro quo sexual harassment against Defendant Knoxville Harley-Davidson West, LLC.

Yes _____

No _____

Please proceed to question No. 21.

21. Do you find that the Plaintiff has carried her burden of proof by a preponderance of the evidence on all the elements of her claim for sex discrimination in the form of a sexually hostile work environment against Defendant Knoxville Harley-Davidson West, LLC.

Yes _____

No _____

Please proceed to question No. 22.

22. Do you find by a preponderance of the evidence that Plaintiff was constructively discharged from her employment at Knoxville Harley-Davidson West, LLC.

Yes _____

No _____

If you answered Yes, then proceed to question No. 25. If you answered No, the proceed to Question No. 23.

23. Do you find by a preponderance of the evidence that Knoxville Harley Davidson West, LLC exercised reasonable care to prevent and correct promptly any sexually harassing behavior?

Yes _____ No _____

If you answered No, then proceed to question No. 25. If you answered Yes, then proceed to question No. 24.

24. Do you find by a preponderance of the evidence that the Plaintiff employee unreasonably failed to take advantage of any preventative or corrective opportunities provided by the employer or that the employee unreasonably failed to otherwise avoid harm.

Yes _____ No _____

If you answered No, then proceed to Question No. 25. If you answered yes on both Questions No. 23 and 24, then turn in the Jury Verdict form to the Court.

25. If you answered "Yes" to one or both questions No. 20 or 21 on the claims for sex discrimination in the form of quid pro quo sexual harassment or sex discrimination in the form of a sexually hostile work environment against Knoxville Harley-Davidson West, LLC, please state the amount, if any, of damages for these claims as follows:

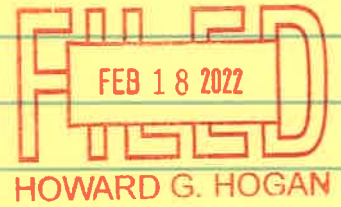
Back pay: \$ _____
Compensatory Damages: \$ _____

Please turn in the Jury Verdict form to the Court.

Sign below and return the jury verdict form to the Court.

James Howell
FOREPERSON

2/18/22
Date



Jury Verdict Form

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

What amount of punitive damages do you find in this case?

4 million

Sign below and return the jury verdict form to the Court.

John Maxwell
Foreperson

2/18/22
Date