

HONORABLE RONALD B. LEIGHTON

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ANDRE THOMPSON, and BRYSON  
CHAPLIN,

Plaintiffs,

v.

CITY OF OLYMPIA, et al.,

Defendants.

CASE NO. C18-5267RBL

VERDICT FORM

We, the jury, answer the questions submitted by the Court as follows:

**Question 1:** Do you find that Officer Donald violated Andre Thompson's constitutional rights by using excessive force on May 21, 2015?

Yes

No

**Question 2:** Do you find that Officer Donald violated Bryson Chaplin's constitutional rights by using excessive force on May 21, 2015?

Yes

No

1           **Question 3:** Do you find that the City of Olympia's failure to train its officers was the  
2 moving force behind a violation of Andre Thompson's constitutional rights?

3                   \_\_\_\_\_ Yes                     No

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5           **Question 4:** Do you find that the City of Olympia's failure to train its officers was the  
6 moving force behind a violation of Bryson Chaplin's constitutional rights?

7                   \_\_\_\_\_ Yes                     No

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9           **Question 5:** Do you find that the City of Olympia's official policy, practice, or custom  
10 was the moving force behind a violation of Andre Thompson's constitutional rights?

11                   \_\_\_\_\_ Yes                     No

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13           **Question 6:** Do you find that the City of Olympia's official policy, practice, or custom  
14 was the moving force behind a violation of Bryson Chaplin's constitutional rights?

15                   \_\_\_\_\_ Yes                     No

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17           **Question 7:** Do you find for Andre Thompson on his negligence claim against Officer  
18 Donald and the City of Olympia?

19                   \_\_\_\_\_ Yes                     No

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21           *If you answered Yes to Question 7, answer Question 8. If you answered No to Question 7,*  
22 *go to Question 10.*

1 **Question 8:** Do you find that Andre Thompson was contributorily negligent?

2  Yes  No

3 *If you answered Yes to Question 8, answer Question 9. If you answered No to Question 8,*  
4 *go to Question 10.*

5 **Question 9:** What percentage of fault do you assign to Andre Thompson on the one  
6 hand, and to Officer Donald on the other? Your total should equal 100%.

7 Andre Thompson \_\_\_\_\_ %

8 Officer Donald \_\_\_\_\_ %

9  
10 **Question 10:** Do you find for Bryson Chaplin on his negligence claim against Officer  
11 Donald and the City of Olympia?

12  Yes  No

13 *If you answered Yes to Question 10, answer Question 11. If you answered No to Question*  
14 *10, go to Question 13.*

15 **Question 11:** Do you find that Bryson Chaplin was contributorily negligent?

16  Yes  No

17 *If you answered Yes to Question 11, answer Question 12. If you answered No to Question*  
18 *11, go to Question 13.*

19 **Question 12:** What percentage of fault do you assign to Bryson Chaplin on the one hand,  
20 and to Officer Donald on the other? Your total should equal 100%

21 Bryson Chaplin \_\_\_\_\_ %

22 Officer Donald \_\_\_\_\_ %

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**Question 13:** Do you find for Andre Thompson on his outrage claim against Officer Donald and the City of Olympia?

Yes  No

**Question 14:** Do you find for Bryson Chaplin on his outrage claim against Officer Donald and the City of Olympia?

Yes  No

*The presiding juror should date and sign this verdict form and advise the Court that you have reached a verdict.*

Dated this 10<sup>th</sup> day of October 2019.

~~\_\_\_\_\_~~  
PRESIDING JUROR