

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON

STEPHEN CHAUSSEE, an individual,

Plaintiff,

vs.

STATE OF WASHINGTON,

Defendant.

FILED
SUPERIOR COURT
THURSTON COUNTY WA
2015 MAR 26 PM 4:
Linda Myhre Enlow
Thurston County Clerk

No. 11-2-01884-6

SPECIAL VERDICT

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

Question No. 1: Did Mr. Chaussee prove that he was a whistleblower?

ANSWER: Yes No

Question No. 2: Did Mr. Chaussee prove that he was demoted?

ANSWER: Yes No

INSTRUCTION: *If you answered "yes" to Questions 1 and 2, answer Question 3. If you answered "no" to either Question 1 or 2, do not answer any further questions and sign the verdict form.*

Question No. 3: Did the State prove:

(a) That the demotion action was taken for reasons unrelated to Mr. Chaussee's status as a whistleblower;

and

(b) That an improper retaliatory motive was not a substantial factor in the decision to demote Mr. Chaussee?

ANSWER: _____ Yes No

INSTRUCTION: *If you answered "Yes" to Question 3, do not answer any further questions and sign the verdict form. If you answered "no" to Question 3, answer Question 4.*

Question No. 4: Did the plaintiff suffer any noneconomic damages that were proximately caused by the Washington State Department of Transportation's decision to demote him?

ANSWER: Yes _____ No

INSTRUCTION: *If you answered "Yes" to Question 4, answer Question 5. If you answered "no" to Question 4, do not answer any further questions and sign the verdict form.*

Question No. 5: What do you find to be the amount of plaintiff's damages?

ANSWER: \$1 Million

INSTRUCTION: *Sign and return this verdict form, and notify the bailiff.*

DATED this 26 DAY of MARCH, 2015.

Brent A. Boehmer
Presiding Juror

FILED
SUPERIOR COURT
THURSTON COUNTY, WA.

2015 MAR 26 PM 4:12

Linda Myhre Enlow
Thurston County Clerk

EXPEDITE
 No Hearing Set
 Hearing is Set
Trial: **March 16, 2015**
Time: **9:00 a.m**
Judge/Calendar: Gary R. Tabor

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

STEPHEN CHAUSSEE, an individual,

Plaintiff,

vs.

STATE OF WASHINGTON,

Defendant.

Case No.: 11-2-01884-6

Hon. Gary R. Tabor

**PLAINTIFF'S JUDGMENT ON JURY
VERDICT**

[CLERK'S ACTION REQUIRED]

JUDGMENT SUMMARY

Judgment Creditor: Stephen Chaussee

Judgment Creditor's Attorney: John P. Sheridan

Judgment Debtor: State of Washington

Judgment Amount: \$ 1,000,000.00

Prejudgment Interest: To be determined at a later date

Attorney Fees: To be determined at a later date

This matter was tried by a jury of twelve from March 16, 2015 to March 25, 2015, with the Honorable Gary Tabor presiding. Plaintiff Stephen Chaussee appeared

1 personally and through his attorney of record, John P. Sheridan, of The Sheridan Law
2 Firm, P.S. Defendant State of Washington appeared through its designated
3 representative and through its attorneys, Joseph M. Diaz and Alicia O. Young, of the
4 Attorney General of Washington State's Office.

5 The parties presented evidence and testimony to the jury and on March _____,
6 2015, the jury returned a verdict in favor of Plaintiff Stephen Chaussee on his claims
7 as follows:

8 Emotional Harm: \$ 1,000,000

9
10 Total: \$ 1,000,000

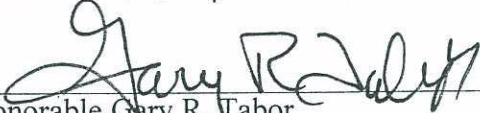
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12 A copy of the jury's verdict is attached.

13 Motions for attorney fees and costs will be set for hearing based on the
14 schedules of the parties and the Court.

15 Consistent with the jury's verdict in this action, the Court enters judgment as
16 follows:

17 Monetary Relief: \$1,000,000.

18
19 DATED THIS 26 DAY OF March, 2015.

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21 
22 Honorable Gary R. Tabor
23 Thurston County Superior Court
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Presented By:

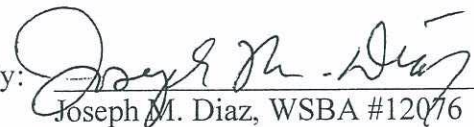
THE SHERIDAN LAW FIRM, P.S.



By: s/John P Sheridan
John P. Sheridan, WSBA #21473
Attorney for Plaintiff
Stephen Chaussee

Approved as to Form:

ROBERT W. FERGUSON
Attorney General of Washington



By: Joseph M. Diaz
Joseph M. Diaz, WSBA #12076
Alicia O. Young, WSBA #35553
Assistant Attorneys General
Attorneys for Defendant State of
Washington