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STATE OF WASHINGTON
YAKIMA COUNTY SUPERIOR COURT

DAWNE HYDE,

Plaintiff,

vs.

STATE OF WASHINGTON,

Defendant.

NO. 16-2-00595-39

SPECIAL VERDICT FORM

We, the jury, make the following answers to the questions submitted by the court:

Question No. 1: Has Ms. Hyde proved by a preponderance of the evidence that she was a "whistleblower" under the Washington State Employee Whistleblower Protection Act?

ANSWER: Yes No

Question No. 2: Has Ms. Hyde proved by a preponderance of the evidence that DSHS subjected Ms. Hyde to one or more workplace reprisals or retaliatory actions under the Washington State Employee Whistleblower Protection Act?

ANSWER: Yes No

INSTRUCTION: *If you answered "No" to Question Nos. 1 or 2, skip the remaining questions, sign and date this Special Verdict Form, and notify the bailiff that you have reached a verdict. If you answered "Yes" to Questions Nos. 1 and 2, proceed to Question No. 3.*

ORIGINAL

1 **Question No. 3:** Has DSHS proved by a preponderance of the evidence that there
2 have been a series of documented personnel problems or a single, egregious event, or that the
3 DSHS's action or actions were justified by reasons unrelated to Ms. Hyde's status as a
4 whistleblower and that improper motive was not a substantial factor?

5 ANSWER: _____ Yes X No

6
7 INSTRUCTION: *If you answered "Yes" to Question No. 3, skip the remaining*
8 *questions, sign and date this Special Verdict Form, and notify the bailiff that you*
9 *have reached a verdict. If you answered "No" to Question No. 3, proceed to*
10 *Question No. 4.*

11 **Question No. 4:** Has Ms. Hyde proved by a preponderance of the evidence that
12 DSHS's actions proximately caused her damages?

13 ANSWER: X Yes _____ No

14 INSTRUCTION: *If you answered "No" to Question No. 4, skip Question No.*
15 *5, sign and date this Special Verdict Form, and notify the bailiff that you have*
16 *reached a verdict. If you answered "Yes" to Question No. 4, proceed to Question*
17 *No. 5.*

18 **Question No. 5:** What do you find to be the amount of Ms. Hyde's damages?

19 A. Economic Loss:

20 1. Back Pay: \$ 101,260

21 2. Lost Pension: \$ 580,683

22 B. Emotional Harm: \$ 1,240,000

23
24 DATE: 12/20/2022

25 
PRESIDING JUROR

26 ORIGINAL