

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT  
CIVIL ACTION  
No. 01-2737

MALVINA MONTEIRO,  
Plaintiff,

vs.

CITY OF CAMBRIDGE,  
Defendant.

SPECIAL VERDICT QUESTIONS

State your verdict with regard to each when twelve (12) of you are in agreement.

1. Did the plaintiff Malvina Monteiro prove that the City of Cambridge retaliated against her by terminating her employment?

Yes \_\_\_\_\_ ☒ No \_\_\_\_\_

If you answered yes to Question No. 1, proceed to Question No. 2. If you answered no to Question No. 1, proceed to Question No. 3.

2. State the dollar amount of the damages to which you find that the plaintiff Malvina Monteiro is entitled as a result of the retaliatory termination of her employment by the City of Cambridge.

Back pay, front pay and consequential damages:

\$ 962,400  
Amount in Dollars

Nine hundred sixty two thousand four hundred dollars  
Amount in Words

Emotional Distress

\$ 100,000  
Amount in Dollars

One hundred thousand dollars  
Amount in Words

3. Did the plaintiff Malvina Monteiro prove that she suffered retaliation, that is, materially adverse employment action(s), other than termination of employment, because she pursued her legal rights in a discrimination claim against the City of Cambridge?

Yes       ✓       No                     

If you have answered yes to Question No. 3, proceed to Question No. 4. If you have answered no to Question No. 3, proceed to Question No. 5.

4. State the total dollar amount of the damages to which you find that the plaintiff Malvina Monteiro is entitled as a result of any materially adverse employment action(s) that you have found. (The same damages cannot be awarded more than once.)

\$ 0  
Amount in Dollars

Zero dollars  
Amount in Words

5. Do you find that the conduct of the City of Cambridge was so extreme in nature as to warrant punitive damages?

Yes       ✓       No                     

If you have answered yes to Question No. 5, proceed to Question No. 6. If you have answered no to Question No. 5, your deliberations are complete and you should so inform the court officer.

6. State the amount of punitive damages that you find to be warranted.

\$ 3,500,000  
Amount in Dollars

Three million five hundred thousand dollars  
Amount in Words

I hereby certify that the above answers are those of at least 12 of 14 jurors.

  
Foreperson

Dated: May 23, 2008