

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA**

**TRUSSELL GEORGE, JR.**

**Case No. 3:14-cv-00338**

**JUDGE JOHN W.  
deGRAVELLES**

**v.**

**MAGISTRATE JUDGE  
RICHARD L. BOURGEOIS,  
JR.**

**LOUISIANA DEPARTMENT  
OF PUBLIC SAFETY AND  
CORRECTIONS *ET AL.***

**JURY TRIAL**

**JURY VERDICT FORM**

**FIRST CLAIM - DISCRIMINATION IN VIOLATION OF TITLE  
II OF THE AMERICANS WITH DISABILITIES ACT AND  
SECTION 504 OF THE REHABILITATION ACT BY  
LOUISIANA DEPARTMENT OF HEALTH AND HOSPITALS  
("DHH")**

INTERROGATORY Number 1a

Did Defendant, DHH, discriminate against Plaintiff because of his disabilities?

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

(Regardless of your answer, proceed to Interrogatory  
Number 1b.)

INTERROGATORY Number 1b

Did Defendant, DHH, fail to provide Plaintiff with a reasonable

modification appropriate for his disabilities?

\_\_\_\_\_ Yes ☒ No

(If you answered "Yes," proceed to Interrogatory Number 1c. If you answered "No," proceed to Interrogatory Number 2a.)

INTERROGATORY Number 1c

Has Defendant, DHH, proved that it would have been an undue hardship for it to provide Plaintiff with a reasonable modification appropriate for his disabilities?

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

(Regardless of whether you answered "Yes" or "No," proceed to Interrogatory Number 2a.)

**SECOND CLAIM - DISCRIMINATION IN VIOLATION OF TITLE II OF THE AMERICANS WITH DISABILITIES ACT AND SECTION 504 OF THE REHABILITATION ACT BY LOUISIANA DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS ("LDPSC")**

INTERROGATORY Number 2a

Did Defendant, LDPSC, discriminate against Plaintiff because of his disabilities?

\_\_\_\_\_ Yes ☒ No

(Regardless of your answer, proceed to Interrogatory Number 2b.)

INTERROGATORY Number 2b

Did Defendant, LDPSC, fail to provide Plaintiff with a reasonable modification appropriate for his disabilities?

\_\_\_\_\_ Yes ☒ No

(If you answered "Yes," proceed to Interrogatory Number 2c. If you answered "No," then go to the

highlighted instructions that appear after Interrogatory Number 2c.)

INTERROGATORY Number 2c

Has Defendant, LDPSC, proved that it would have been an undue hardship for it to provide Plaintiff with a reasonable modification appropriate for his disabilities?

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

(If you answered,

1. "Yes" to Interrogatory Number 1a; **or**
2. "Yes" to Interrogatory Number 1b **and** "No" to Interrogatory Number 1c; **or**
3. "Yes" to Interrogatory Number 2a; **or**
4. "Yes" to Interrogatory Number 2b **and** "No" to Interrogatory Number 2c

Proceed to Interrogatory Number 3.

Otherwise, STOP, sign and date the Jury Verdict Form, and alert the CSO.)

**COMPENSATORY DAMAGES UNDER TITLE II OF THE AMERICANS WITH DISABILITIES ACT AND SECTION 504 OF THE REHABILITATION ACT**

INTERROGATORY Number 3:

Do you find that the Plaintiff's incarcerations in 2013 and/or 2014 caused him damage?

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

(If you marked "Yes," please proceed to Interrogatory Number 4. If you answered "No," then STOP, sign and date the Jury Verdict Form, and alert the CSO.)



INTERROGATORY Number 4

What amount will compensate Plaintiff for the damages, if any, he suffered as a result of the Defendant(s)' violation of the Americans with Disabilities Act and/or Rehabilitation Act?

Answer in dollars and cents for the following items and none other:

1. Past bodily harm, pain and suffering, inconvenience, mental anguish, and enjoyment of life.

AMOUNT \$\_\_\_\_\_

2. Future pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

AMOUNT \$\_\_\_\_\_

(If you inputted any sum, please proceed to Interrogatory Number 5.)

INTERROGATORY Number 5

If you found either or both Defendants liable and awarded the Plaintiff any compensatory damages, how do you allocate the percentage of fault between the two Defendants?

\_\_\_\_\_ % LDPSC

\_\_\_\_\_ % DHH

\_\_\_\_\_ % Total (must be 100%).

(Please sign the verdict form and hand it in.)