UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

EDWA	ARD T. SAADI,	
	Plaintiff,	
V.		Case No. 8:07-cv-1976-T-24 MAP
PIERR	RE A. MAROUN,	
	Defendant,	
	2	TERDICT FORM
<u>Court</u>	's Interrogatories:	
<u>1. On</u>	the matter of Plaintiff's Exhibit	<u>t 16</u> :
1(a).	/	Exhibit 16 identify and pertain to Edward Saadi?
	Yes_\	No
and yo 1(b).]		No, then your verdict is for Defendant as to this Exhibit answer to this question is Yes, proceed to question
1(b).	Did the statements in Plaintiff's	Exhibit 16 have a defamatory effect on Edward Saadi?
	Yes	No
and yo 1(c).]		No, then your verdict is for Defendant as to this Exhibit answer to this question is Yes, proceed to question

2(b).]

1(c).	Were the statements in Plaintiff's Exhibit 16 published by Pierre Maroun?				
	Yes	No			
and ye 1(d).]	you must skip to Question 2. If your answ	hen your verdict is for Defendant as to this Exh wer to this question is Yes, proceed to question	ibit		
1(d).	Were the statements in Plaintiff's Exh	ibit 16 the legal cause of injury to Edward Saad	li?		
	Yes	No			
and ye 1(e).]	you must skip to Question 2. If your answ	hen your verdict is for Defendant as to this Exh wer to this question is Yes, proceed to question	ibit		
1(e).	Were the statements in Plaintiff's Exh	nibit 16 substantially true and made with good			
	motive? Yes	No			
	[If the answer to this question is No, to this newer to this question is Yes, then your version 2.]	hen your verdict is for Plaintiff as to this Exhib verdict is for Defendant as to this Exhibit. Proc	it. Ļ		
2. Or	on the matter of Plaintiff's Exhibit 17:				
2(a).	Did the statements in Plaintiff's Exhibit 17 identify and pertain to Edward Saadi?				
	Yes	No			
and y	[If the answer to this question is No, t you must skip to Question 3. If your answ	hen your verdict is for Defendant as to this Exh wer to this question is Yes, proceed to question	ıibit		

2(b).	(b). Did the statements in Plaintiff's Exhibit 17 have a defamatory effect on Edward Saar						
	Yes No						
and yo 2(c).]	[If the answer to this question is No, then your verdict is for Defendant as to this Exhou must skip to Question 3. If your answer to this question is Yes, proceed to question	ibit					
2(c).	Were the statements in Plaintiff's Exhibit 17 published by Pierre Maroun?						
	Yes No						
and yo 2(d).]	[If the answer to this question is No, then your verdict is for Defendant as to this Exhou must skip to Question 3. If your answer to this question is Yes, proceed to question	ibit					
2(d).	Were the statements in Plaintiff's Exhibit 17 the legal cause of injury to Edward Saac	li?					
	Yes No						
and yo 2(e).]	[If the answer to this question is No, then your verdict is for Defendant as to this Exhou must skip to Question 3. If your answer to this question is Yes, proceed to question	ibit					
2(e).	Were the statements in Plaintiff's Exhibit 17 substantially true and made with good						
	motive? Yes No						
	Yes No						
	[If the answer to this question is No, then your verdict is for Plaintiff as to this Exhib swer to this question is Yes, then your verdict is for Defendant as to this Exhibit. Procession 3.]	it. Ij :eed					
3. On	the matter of Plaintiff's Exhibit 18:						
3(a).	Did the statements in Plaintiff's Exhibit 18 identify and pertain to Edward Saadi?						
	Yes No						
	[If the answer to this question is No, then your verdict is for Defendant as to this Exh	iibit					

and you must skip to Question 4. If your answer to this question is Yes, proceed to question

3(b).]

3(b). Did the statements in Plaintiff's Exhibit 18 have a defamatory effect of						on Edward Saadi?
		Yes_			No	
and yo 3(c).]	[If the answer ou must skip to (to this Questi	question on 4. If y	n is No, then your verd your answer to this que	lict is for Defend estion is Yes, pro	ant as to this Exhibit oceed to question
3(c).	Were the state			iff's Exhibit 18 publis	hed by Pierre Ma	aroun?
		Yes_	$\sqrt{}$		No	
and yo 3(d).]	ou must skip to	to this Questi	s question on 4. If y	n is No, then your verd your answer to this que	lict is for Defena	lant as to this Exhibit oceed to question
3(d).	Were the state			iff's Exhibit 18 the leg		ry to Edward Saadi?
		Yes_			No	
and ye 3(e).]	ou must skip to	to thi. Questi	s question on 4. If y	n is No, then your vera your answer to this qua	lict is for Defend estion is Yes, pro	lant as to this Exhibit oceed to question
3(e).	Were the state	ements	in Plaint	iff's Exhibit 18 substa	antially true and	made with good
	motive?				/	
	Yes_		_	No_\		

[If the answer to this question is No, then your verdict is for Plaintiff as to this Exhibit. If the answer to this question is Yes, then your verdict is for Defendant as to this Exhibit. Proceed to question 4.]

4. On the matter of Plaintiff's Exhibit 19:

4(a). Did the statements in Plaintiff's Exhibit 19 identify and pertain to Edward Saadi?

Yes V

No

[If the answer to this question is No, then your verdict is for Defendant as to this Exhibit and you must skip to Question 5. If your answer to this question is Yes, proceed to question 4(b).]

4(b). Did the statements in Plaintiff's Exhibit 19 have a defamatory effect on Edward Saadi?

Yes V

No

[If the answer to this question is No, then your verdict is for Defendant as to this Exhibit and you must skip to Question 5. If your answer to this question is Yes, proceed to 4(c).]

- 4(c). The Court has ruled as a matter of law that the statements in Plaintiff's Exhibit 19 were published by Pierre Maroun. Therefore, proceed to question 4(d).
- 4(d). Were the statements in Plaintiff's Exhibit 19 the legal cause of injury to Edward Saadi?

Yes_

No____

[If the answer to this question is No, then your verdict is for Defendant as to this Exhibit and you must skip to Question 5. If your answer to this question is Yes, proceed to question 4(e).]

4(e). Were the statements in Plaintiff's Exhibit 19 substantially true and made with good

motive?

Yes____

No /

[If the answer to this question is No, then your verdict is for Plaintiff as to this Exhibit. If the answer to this question is Yes, then your verdict is for Defendant as to this Exhibit. Proceed to question 5.]

5. On the matter of Plaintiff's Exhibit 20:

5(a). Did the statements in Plaintiff's Exhibit 20 identify and pertain to Edward Saadi?

Yes_______ No_____

[If the answer to this question is No, then your verdict is for Defendant as to this Exhibit and you must skip to Question 6. If your answer to this question is Yes, proceed to question 5(b).]

5(b). Did the statements in Plaintiff's Exhibit 20 have a defamatory effect on Edward Saadi?

Yes_____ No____

[If the answer to this question is No, then your verdict is for Defendant as to this Exhibit and you must skip to Question 6. If your answer to this question is Yes, proceed to 5(c).]

5(c). The Court has ruled as a matter of law that the statements in Plaintiff's Exhibit 20 were published by Pierre Maroun. Therefore, proceed to question 5(d).

5(d). Were the statements in Plaintiff's Exhibit 20 the legal cause of injury to Edward Saadi?

Yes No____

[If the answer to this question is No, then your verdict is for Defendant as to this Exhibit and you must skip to Question 6. If your answer to this question is Yes, proceed to question 5(e).]

5(e). Were the statements in Plaintiff's Exhibit 20 substantially true and made with good

motive?

Yes_____

No_v/

[If the answer to this question is No, then your verdict is for Plaintiff as to this Exhibit. If the answer to this question is Yes, then your verdict is for Defendant as to this Exhibit. Proceed to question 6.]

Verdict as to all of Plaintiff's Exhibits, Nos. 16, 17, 18, 19, and 20:

As to the claims relating to Plaintiff's Exhibits, Nos. 16, 17, 18, 19, and 20, we, the jury, 6. find as follows: As to Exhibit 16, we find in favor of: (a) Plaintiff Edward Saadi Defendant Pierre Maroun As to Exhibit 17, we find in favor of: (b) Plaintiff Edward Saadi Defendant Pierre Maroun As to Exhibit 18, we find in favor of: (c) Plaintiff Edward Saadi Defendant Pierre Maroun As to Exhibit 19, we find in favor of: (d) Plaintiff Edward Saadi Defendant Pierre Maroun As to Exhibit 20, we find in favor of: (e) Plaintiff Edward Saadi Defendant Pierre Maroun As to the claims relating to Plaintiff's Exhibits to which we found in Plaintiff's favor in 7. question 6, we find that the amount of compensatory damages, if any, that Plaintiff Edward Saadi should be awarded is: for injury to reputation or health and any shame, humiliation, mental anguish, and (a) hurt feelings \$ 0.00 for impairment of business, social, religious, or family relationships \$ 0.00 (b) for aggravation of an existing disease or physical defect resulting from such (c)

statements \$_0.00

- (d) for reasonable value of medical care and treatment necessarily or reasonably obtained by Plaintiff \$5,000,00
- for earnings lost in the past and any loss of ability to earn money in the future \$\bigs_25,000,00
- 8. If you find that Plaintiff has not established that he suffered actual damages caused by the publication of the statements contained in any Exhibit or Exhibits for which you rendered a verdict in Plaintiff's favor in question 6, then you may award an amount of nominal damages relating to those Exhibit(s). The amount of nominal damages, if any, that Plaintiff Edward Saadi should be awarded is \$___O,OO______.
- 9. As to the claims relating to Plaintiff's Exhibits to which we found in Plaintiff's favor in question 6, we find that the amount of punitive damages, if any, that Plaintiff Edward Saadi should be awarded is \$ 60,000.00

SO SAY WE ALL, this ____ day of October 2009.

FOREPERSON