

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

FILED  
2011 MAR 11 AM 11:00  
FOURTH JUDICIAL DISTRICT  
BY HENRI...  
COURT

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

Jerry L. Moore,  
Plaintiff,

SPECIAL VERDICT FORM

Court File No. 27-CV-09-17778

vs.

John Hoff a/k/a Johnny Northside,  
Defendant.

We, THE JURY, in the above-entitled action, for our special verdict, answer the question submitted to us as follows:

1. Was the statement "Repeated and specific evidence in Hennepin County District Court shows that Jerry Moore was involved with a high-profile fraudulent mortgage at 1564 Hillside Ave. N." false?

NO  
Yes or No

2. *If your answer to Question 1 was "Yes," then answer this question:* Did the statement "Repeated and specific evidence in Hennepin County District Court shows that Jerry Moore was involved with a high-profile fraudulent mortgage at 1564 Hillside Ave. N." convey a defamatory meaning as to Jerry Moore?

                      
Yes or No

3. *If your answer to Question 2 was "Yes," then answer this question:* By clear and convincing evidence, was the statement "Repeated and specific evidence in Hennepin County District Court shows that Jerry Moore was involved with a high-profile fraudulent mortgage at 1564 Hillside Ave. N." made by John Hoff with actual malice?

                      
Yes or No

*[If your answer to Question 3 was "Yes", then answer Questions 4 and 5.]*

4. What amount of money will fairly and adequately compensate Jerry Moore for damages directly caused by the defamatory statement "Repeated and specific evidence in Hennepin County District Court shows that Jerry Moore was involved with a high-profile fraudulent mortgage at 1564 Hillside Ave. N." up to the time of this verdict, for:

a. Past harm to his reputation, mental distress, humiliation, and embarrassment? \$ \_\_\_\_\_

b. Past economic loss? \$ \_\_\_\_\_

5. What amount of money will fairly and adequately compensate Jerry Moore for damages reasonably certain to occur in the future, directly caused by the defamatory statement "Repeated and specific evidence in Hennepin County District Court shows that Jerry Moore was involved with a high-profile fraudulent mortgage at 1564 Hillside Ave. N." for:

- a. Future harm to his reputation, mental distress, humiliation, and embarrassment? \$ \_\_\_\_\_
- b. Loss of future earning capacity? \$ \_\_\_\_\_

[Answer Questions 6 and 7 regardless of your answers to Questions 1-5.]

6. Did John Hoff intentionally interfere with Jerry Moore's employment contract?  
Yes  
Yes or No

7. Did John Hoff interfere with Jerry Moore's prospective employment advantage?  
Yes  
Yes or No

[If your answer to Questions 6 and/or 7 were "Yes," then answer Question 8.]

8. What amount of money will fairly and adequately compensate Jerry Moore for damages caused by interference with a contractual relationship and/or prospective advantage for:

- a. Loss of benefits of the contract or the prospective relationship? ~~0~~ \$ 35,000
- b. Other losses directly caused by the interference? \$ 0
- c. Emotional distress or actual harm to reputation, if these factors can reasonably be expected to result from the interference? \$ 25,000

Arbetta Brunson  
Foreperson

Jurors concurring sign here:

1. \_\_\_\_\_  
2. \_\_\_\_\_  
3. \_\_\_\_\_

4. \_\_\_\_\_  
5. \_\_\_\_\_  
6. \_\_\_\_\_

Dated: \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ m. at Minneapolis, Minnesota.