

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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MAR 20 2024
AT GREENBELT
CLERK, U.S. DISTRICT COURT
BY DISTRICT OF MARYLAND
DEPUTY

KARA LYNN MCMURRAY

Plaintiff,

v.

LT. RICHARD JOHN TALLANT, et al

Defendants.

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Civil No. PJM-20-0919

VERDICT SHEET

1. With respect to Count I (Denial of Equal Protection Claim – Tallant), in whose favor do you find as between Plaintiff and Defendant Tallant?

Plaintiff ☒

Defendant Tallant ☐

2. With respect to Count I (Deprivation of Liberty under Due Process Clause – Tallant), in whose favor do you find as between Plaintiff and Defendant Tallant?

Plaintiff ☒

Defendant Tallant ☐

3. With respect to Count III (Battery – Tallant), in whose favor do you find as between Plaintiff and Defendant Tallant?

Plaintiff ☒

Defendant Tallant ☐

4. With respect to Count IV (False Imprisonment – Tallant), in whose favor do you find as between Plaintiff and Defendant Tallant?

Plaintiff ☒

Defendant Tallant ☐

5. With respect to Count II (First Amendment Claim – Prince George’s County = Prince George’s County Police Department), in whose favor do you find as between Plaintiff and Defendant Prince George’s County?

Plaintiff ✓

Defendant Prince George’s County _____

If you find in favor of Prince George’s County on Question 5, please proceed directly to Question 11.

6. If your answer to Question 5 is in favor of Plaintiff, how do you find as to whether the Prince George’s County Police Department was deliberately indifferent to a policy, custom, or practice by which a member of the Police Department who reported another police officer for misconduct was subject to “black balling”, i.e. shunning, ostracizing, and having hostile comments (including slander) made by other officers?

Defendant Prince George’s County was deliberately indifferent ✓

Defendant Prince George’s County was not deliberately indifferent _____

7. If you find that a policy, custom or practice as described in Question 6 existed, indicate which of one or more of the following that you find:

Policy _____

Custom ✓

Practice ✓

8. If you find in Questions 6 and 7 that a policy, custom or practice existed, how do you find as to whether Plaintiff herself was subjected to any “black balling”, as defined in Question 6, within the Prince George’s County Police Department:

Was Subjected ✓

Was Not Subjected _____

9. How do you find as to whether the Prince George's County Police Department was deliberately indifferent to a policy, custom, or practice by which members of the Prince George's County Police Department were subjected to the fact of or a reasonable fear of not receiving backup while in service by other members of the Department? (Check any one or more of the following:)

Policy _____
Custom ✓
Practice ✓

10. If you find that a policy, custom or practice as described in Question 9 existed, in whose favor do you find as to whether Plaintiff herself was subjected to the fact or reasonable fear of not receiving backup within the Prince George's County Police Department:

Was Subjected ✓

Was Not Subjected _____

11. With respect to Count V (Hostile Work Environment), in whose favor do you find as between Plaintiff and Defendant Prince George's County = Prince George's County Police Department?

Plaintiff ✓

Defendant Prince George's County _____

12. If you find in favor of Plaintiff on Question 11, how do you find as to Defendant Prince George's County's affirmative defense pertaining to remedial action taken by Plaintiff or the County?

Proven _____

Not Proven ✓

13. If you find in favor of Plaintiff in Question 10 or 11, how do you find as to whether Plaintiff was constructively discharged from her employment with the Prince George's County Police Department?

Was ✓

Was Not _____

14. With respect to Count VI (Retaliation), how do you find as between Plaintiff and Defendant Prince George's County = Prince George's County Police Department?

Plaintiff ✓

Defendant Prince George's County _____

15. If you find in favor of Plaintiff as to any or all of Counts I, III or IV (against Defendant Tallant), what non-economic damages, if any, do you award to Plaintiff? (Choose only one of the following:)

Compensatory Damages \$ 185,000.00

Nominal Damages \$ _____

16. If you find for Plaintiff as to any or all of Counts II, V and VI (against Defendant Prince George's County = Prince George's County Police Department), what non-economic damages, if any, do you award to Plaintiff? (Choose only one of the following:)

Compensatory Damages \$ 200,000.00

Nominal Damages \$ _____

I hereby affirm that the foregoing Answers are true and correct.

March 20, 2024
Date

SIGNATURE REDACTED