

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
BRIGID PIERCE,

Plaintiff,

- against -

**VERDICT FORM**  
21-CV-3482 (PKC) (JRC)

NEW YORK CITY POLICE DEPARTMENT  
OFFICER JOSEPH RYDER, *et al.*,

Defendants.  
-----X

PAMELA K. CHEN, United States District Judge:

We, the jury, make the following findings pursuant to the Court's instructions:

**LIABILITY**

**I. Excessive Force and Assault and Battery**

1. Did Brigid Pierce prove by a preponderance of the evidence that Officer Joseph Ryder used excessive force and, therefore, that Officer Ryder and the City of New York are also liable for assault and battery?

\_\_\_\_\_ Yes

X \_\_\_\_\_ No

2. Did Brigid Pierce prove by a preponderance of the evidence that, as a result of the conduct of one or more "John Doe" officers, the City of New York is liable for assault and battery?

X \_\_\_\_\_ Yes

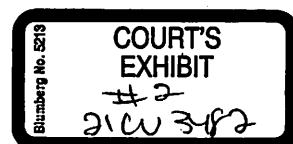
\_\_\_\_\_ No

3. Did Brigid Pierce prove by a preponderance of the evidence that Officer Joseph Ryder failed to intervene in excessive force committed by any "John Doe" officer against her?

\_\_\_\_\_ Yes

X \_\_\_\_\_ No

*Please proceed to the next page of the Verdict Form.*



**II. False Arrest**

4. Did Brigid Pierce prove by a preponderance of the evidence that Officer Joseph Ryder falsely arrested her and that, therefore, Officer Ryder and the City of New York are liable for false arrest?

\_\_\_\_\_ Yes

X No

**III. First Amendment Retaliation**

5. Did Brigid Pierce prove by a preponderance of the evidence that Officer Joseph Ryder violated her right to free speech when he used force against her?

\_\_\_\_\_ Yes

X No

6. Did Brigid Pierce prove by a preponderance of the evidence that Officer Joseph Ryder violated her right to free speech when he arrested her?

\_\_\_\_\_ Yes

X No

**IV. Malicious Prosecution**

7. Did Brigid Pierce prove by a preponderance of the evidence that Officer Danielle Moses maliciously prosecuted Ms. Pierce and that, therefore, Officer Moses and the City of New York are liable for malicious prosecution?

\_\_\_\_\_ Yes

X No

*Please proceed to the next page of the Verdict Form.*

V. **Negligent Denial of Medical Care**

8. Did Brigid Pierce prove by a preponderance of the evidence that Officer Joseph Ryder negligently denied Ms. Pierce medical care and that, therefore, Officer Ryder and the City of New York are liable for negligent denial of medical care?

  X   Yes        No

9. Did Brigid Pierce prove by a preponderance of the evidence that Officer Michael Said negligently denied Ms. Pierce medical care and that, therefore, Officer Said and the City of New York are liable for negligent denial of medical care?

       Yes   X   No

*If you answered "Yes" to one or more of Questions 1–9, proceed to the next page of the Verdict Form.*

*If you answered "No" to all of Questions 1–9, proceed to the last page of the Verdict Form.*

## COMPENSATORY DAMAGES

### VI. Compensatory Damages for Claims Concerning Use of Force

*Answer Questions 10 through 12 if you answered "Yes" to one or more of Questions 1, 2, 3, or 5 on the Verdict Form.*

10. Did Brigid Pierce prove by a preponderance of the evidence that she is entitled to damages for past and future pain and suffering as a result of the force used?

  X   Yes            No

- a. If you answered "Yes" to Question 10, please state the amount of damages that would fairly compensate Brigid Pierce for past and future pain and suffering as a result of the force used:

\$   553.1 K  

11. Did Brigid Pierce prove by a preponderance of the evidence that she is entitled to damages for past and future loss of earnings as a result of the force used?

  X   Yes            No

- a. If you answered "Yes" to Question 11, please state the amount of damages that would fairly compensate Brigid Pierce for past and future loss of earnings as a result of the force used:

\$   945.6 K  

*Please proceed to the next page of the Verdict Form.*

12. Did Brigid Pierce prove by a preponderance of the evidence that she is entitled to damages for life care costs as a result of the force used?

X Yes

\_\_\_\_\_ No

- a. If you answered "Yes" to Question 12, please state the amount of damages that would fairly compensate Brigid Pierce for life care costs as a result of the force used:

\$ 762.65 K

*Answer Question 13 if you answered "No" to all of Questions 10, 11, and 12 on the Verdict Form.*

13. If you answered "No" to all of Questions 10, 11, and 12, please state the amount of nominal damages, not to exceed one dollar, that you award Brigid Pierce for the force used:

\$ \_\_\_\_\_

*Please proceed to the next page of the Verdict Form.*

**VII. Compensatory Damages for Claims Concerning Arrest**

*Answer Question 14 if you answered "Yes" to Questions 4 and/or 6 on the Verdict Form.*

14. Did Brigid Pierce prove by a preponderance of the evidence that she is entitled to damages for false arrest?

\_\_\_\_\_ Yes

~~\_\_\_\_\_~~ No

- a. If you answered "Yes" to Question 14, please state the amount of damages that would fairly compensate Brigid Pierce for false arrest:

\$ \_\_\_\_\_

- b. If you answered "No" to Question 14, please state the amount of nominal damages, if any, not to exceed one dollar, that you award Brigid Pierce for false arrest:

\$ \_\_\_\_\_

*Please proceed to the next page of the Verdict Form.*

**VIII. Compensatory Damages for Claims Concerning Prosecution**

*Answer Question 15 if you answered "Yes" to Question 7 on the Verdict Form.*

15. Did Brigid Pierce prove by a preponderance of the evidence that she is entitled to damages for malicious prosecution?

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

- a. If you answered "Yes" to Question 15, please state the amount of damages that would fairly compensate Brigid Pierce for malicious prosecution:

\$ \_\_\_\_\_

- b. If you answered "No" to Question 15, please state the amount of nominal damages, if any, not to exceed one dollar, that you award Brigid Pierce for malicious prosecution:

\$ \_\_\_\_\_

*Please proceed to the next page of the Verdict Form.*

**IX. Compensatory Damages for Negligent Denial of Medical Care**

*Answer Question 16 if you answered "Yes" to one or more of Questions 8 and/or 9 on the Verdict Form.*

16. Did Brigid Pierce prove by a preponderance of the evidence that she is entitled to damages for negligent denial of medical care?

X Yes

\_\_\_\_\_ No

- a. If you answered "Yes" to Question 16, please state the amount of damages that would fairly compensate Brigid Pierce for negligent denial of medical care:

\$ 302.9K

- b. If you answered "No" to Question 16, please state the amount of nominal damages, if any, not to exceed one dollar, that you award Brigid Pierce for negligent denial of medical care:

\$ \_\_\_\_\_

*Please proceed to the next page of the Verdict Form.*

### PUNITIVE DAMAGES

*Answer Question 17 if you answered "Yes" to one or more of Questions 1, 3, 4, 5, 6, or 8 on the Verdict Form.*

17. Is Brigid Pierce entitled to recover punitive damages against Officer Joseph Ryder?

\_\_\_\_\_ Yes

  X   No

- a. If you answered "Yes" to Question 17, please state the amount of punitive damages Ms. Pierce has proven that she is entitled to recover against Officer Joseph Ryder:

\$ \_\_\_\_\_

*Answer Question 18 if you answered "Yes" to Question 9 on the Verdict Form.*

18. Is Brigid Pierce entitled to recover punitive damages against Officer Michael Said?

\_\_\_\_\_ Yes

  X   No

- a. If you answered "Yes" to Question 18, please state the amount of punitive damages Ms. Pierce has proven that she is entitled to recover against Officer Michael Said:

\$ \_\_\_\_\_

*Please proceed to the next page of the Verdict Form.*

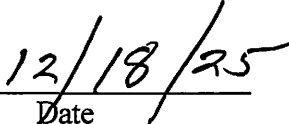
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YOU HAVE REACHED A VERDICT. THE FOREPERSON SHOULD DATE AND SIGN THE VERDICT FORM, PLACE IT IN A SEALED ENVELOPE MARKED "VERDICT" AND HAND IT TO THE MARSHALL.

X. Your foreperson must now sign and date the verdict sheet.

  
\_\_\_\_\_  
Signature of Foreperson

  
\_\_\_\_\_  
Date