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THE HONORABLE TERRENCE CARROLL

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KITSAP COUNTY

JAY WEBSTER, individually and as the  
Guardian of B.W.; and JAN WEBSTER,  
individually,

Plaintiffs,

vs.

BAINBRIDGE ISLAND SCHOOL  
DISTRICT, a Washington municipal  
Corporation,

Defendant.

NO. 10-2-00346-2

SPECIAL VERDICT FORM

The Honorable Terrence Carroll, serving as the finder of fact, answers the following questions, submitted as follows:

**QUESTION NO. 1:** Was the defendant Bainbridge Island School District negligent in this case?

ANSWER: Yes X No \_\_\_\_\_

*If you answered yes, please answer Question no. 2. If you answer no, please answer Question no. 7.*

1 **QUESTION NO. 2:** Was the negligence of Defendant Bainbridge Island School District a  
2 proximate cause of damage to Plaintiff B.W.?

3  
4 ANSWER: Yes  No

5  
6 *If you answered question no. 2 "yes," please answer Question no. 3. If you answered*  
7 *"no" to Question no. 2, please proceed to Question no. 7.*

8 **QUESTION NO. 3:** Was the negligence of Defendant Bainbridge Island School  
9 District a proximate cause of injury to Jan Webster's relationship with B.W.?

10  
11 ANSWER: Yes  No

12  
13 *Please proceed to Question no. 4.*

14  
15 **QUESTION NO. 4:** Was the negligence of Defendant Bainbridge Island School  
16 District a proximate cause of injury to Jay Webster's relationship with B.W.?

17  
18 ANSWER: Yes  No

19  
20 *If you answered Questions 3 and 4 "no," please proceed to Question no. 7. If you*  
21 *answered Question no. 3 "yes" please answer Question no. 5; if you answered Question no. 4*  
22 *"yes," please answer Question no. 6.*

23 **QUESTION NO. 5:** What is the total amount of plaintiff Jan Webster's damages for  
24 the injury to the parent-child relationship that were proximately caused by the negligence of  
25 the defendant Bainbridge Island School District?  
26

1  
2 ANSWER: \$ 25,000

3  
4 **QUESTION NO. 6:** What is the total amount of plaintiff Jay Webster's damages for  
5 the injury to the parent-child relationship that were proximately caused by the negligence of  
6 the defendant Bainbridge Island School District?  
7

8  
9 ANSWER: \$ 25,000

10 **QUESTION NO. 7:** Regarding Plaintiff B.W.'s Title IX claim, was B.W.  
11 discriminated against on the basis of sex or failure to conform to stereotypical male  
12 characteristics?  
13

14 ANSWER: Yes  No

15 *If you answer "yes," please proceed to Question no. 8. If you answered "no," but*  
16 *answered Questions 1 and 2 "yes," please proceed to Question no. 10. If you answered*  
17 *Questions 1, 2 and 7 "no," please sign and date the verdict form.*

18  
19 **QUESTION NO. 8:** Did the District respond with "deliberate indifference" to known  
20 acts of harassment experienced by B.W., in violation of Title IX?  
21

22 ANSWER: Yes  No

23 *If you answer "yes," please proceed to Question no. 9. If you answered "no," but*  
24 *answered Questions 1 and 2 "yes," please proceed to Question no. 10. If you answered*  
25 *Questions 1, 2 and 8 "no," please sign and date the verdict form.*  
26

1           **QUESTION NO. 9:** Was this discrimination a proximate cause of damages to  
2 Plaintiff B.W.?

3 ANSWER: Yes\_\_\_ No\_\_\_  
4

5           *If you answer "yes," please proceed to Question no. 10. If you answered "no," but*  
6 *answered Questions 1 and 2 "yes," please proceed to Question no. 10. If you answered*  
7 *Questions 1, 2 and 9 "no," please sign and date the verdict form.*

8           **QUESTION NO. 10:** What is the total amount of Plaintiff B.W.'s damages  
9 proximately caused by the Defendant Bainbridge Island School District?  
10

11 ANSWER: \$ 250,000  
12

13 Date this 17<sup>th</sup> day of Oct, 2013  
14

15 Terrence Carroll  
16 Judge Terrence Carroll, *ret.*, arbitrator  
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