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6 Attorneys for Plaintiff CINTHYA LARA

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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

10
11 CINTHYA LARA,

12 Plaintiff,

13 v.

14 COVENANT AVIATION SECURITY, LLC;
15 RAYLENE MALDONADO, and DOES 1
through 20, inclusive,

16 Defendants.

CASE NO.: CIV 519977

**JUDGMENT FOR PLAINTIFF ON
SPECIAL JURY VERDICT**

Verdict Date: October 31, 2014

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19 This action came on regularly for trial starting on October 20, 2014 before The Honorable
20 Steven L. Dylina of the above-entitled court. Appearances for Plaintiff and Defendants were noted
21 on the record.

22 A jury of 12 persons, and 1 alternate, was regularly impaneled and sworn. Witnesses were
23 sworn and testified. After hearing the evidence and arguments of counsel, and after being duly
24 instructed by the Court and the cause was submitted to the jury of 12 with directions to return a
25 verdict on special issues.

26 The jury deliberated and thereon duly returned the special verdict, signed by the Presiding
27 Juror on October 31, 2014, as follows:

- 28 1. Was CINTHYA LARA's gender a substantial motivating reason for RALENE

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MALDONADO's activities on July 17, 2012?

Yes No

2. Was CINTHYA LARA's race a substantial motivating reason for RALENE MALDONADO's activities on July 17, 2012?

Yes No

3. Did CINTHYA LARA engage in protected activity when she complained to Human Resources about RALENE MALDONADO's treatment of CINTHYA LARA?

Yes No

If your answer to question 3 is yes, then answer question 4. If you answered no, then proceed to question 5.

4. Was CINTHYA LARA's protected activity a substantial motivating reason for RALENE MALDONADO's activities on July 17, 2012?

Yes No

If your answer to questions 1, 2 or 4 is yes, then answer question 5. If your answer to questions 1, 2 and 4 was no, stop, have the presiding juror sign the form and provide it to the clerk or bailiff.

5. Were RALENE MALDONADO's actions on July 17, 2012, a substantial motivating reason for the Executive Committee's decision to discharge CINTHY LARA?

Yes No

6. Was COVENANT AVIATION SECURITY, LLC's discharge a substantial factor in causing harm to CINTHYA LARA?

Yes No

7. Did COVENANT AVIATION SECURITY, LLC fail to take all reasonable steps to prevent the harassment, discrimination or retaliation?

Yes No

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8. Was COVENANT AVIATION SECURITY, LLC’s failure to prevent the harassment/discrimination/retaliation a substantial factor in causing harm to CINTHYA LARA?

Yes No

9. What are CINTHYA LARA’s damages?

a) Economic loss:	\$151,057
b) Non-economic loss:	\$5,000
TOTAL:	\$156,057

By reason of this special verdict, plaintiff is entitled to judgment against defendants RALENE MALDONADO and COVENANT AVIATION SECURITY, LLC.

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that plaintiff CINTHYA LARA shall have and recover from defendants RALENE MALDONADO and COVENANT AVIATION SECURITY, LLC the sum of \$156,057, with interest thereon at the rate of ten percent (10%) per annum from the date of entry of this judgment until paid, together with prevailing party attorney fees and costs per a separate application.

DATED: _____
Judge of the Superior Court