

JURY FOREPERSON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

KURIAN DAVID, et al.
Plaintiffs

CIVIL ACTION

VERSUS

No. 08-1220

SIGNAL INTERNATIONAL, LLC, et al.,
Defendants

SECTION "E"

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**
Plaintiff

CIVIL ACTION

VERSUS

No. 12-557

SIGNAL INTERNATIONAL, LLC, et al.,
Defendants

SECTION "E"

LAKSHMANAN PONNAYAN ACHARI, et al.,
Plaintiffs

CIVIL ACTION

VERSUS

No. 13-6218
(c/w 13-6219, 13-6220,
13-6221, 14-732, 14-
1818)

SIGNAL INTERNATIONAL, LLC, et al.,
Defendants

SECTION "E"

Applies To:
David v. Signal
(No. 08-1220)

JURY VERDICT FORM—STAGE 2

PLAINTIFFS' CLAIMS

CLAIM ONE: All Plaintiffs

Trafficking Victims Protection Act—Signal

A. Compensatory Damages

Please enter the amount of compensatory damages you award (if any) for Signal's violation of the Trafficking Victims Protection Act:

Sony Sulekha	\$	<u>40,000</u>
Jacob Joseph Kadakkarappally	\$	<u>40,000</u>
Palanyandi Thangamani	\$	<u>175,000</u>
Andrews Isaac Padavettiyil	\$	<u>175,000</u>
Hemant Khuttan	\$	<u>175,000</u>

*If in **Section A** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 6**.*

B. Punitive Damages

1. Do you find from a preponderance of the evidence that Signal acted with malice or reckless indifference when it subjected any Plaintiff to forced labor?

Sony Sulekha	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Jacob Joseph Kadakkarappally	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Palanyandi Thangamani	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Andrews Padavettiyil	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Hemant Khuttan	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>

2. Do you find from a preponderance of the evidence that Signal acted with malice or reckless indifference when it trafficked any Plaintiff for forced labor?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

If you answered "Yes" to Questions 1 and/or 2 above for any Plaintiff(s), please enter the amount of punitive damages below for that Plaintiff(s). If you have answered "No" to both questions for any Plaintiff(s), do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on page 6.

Sony Sulekha \$ 400,000

Jacob Joseph Kadakkarappally \$ 400,000

Palanyandi Thangamani \$ 400,000

Andrews Isaac Padavettiyil \$ 400,000

Hemant Khuttan \$ 400,000

Please proceed to the next Defendant on page 6.

Trafficking Victims Protection Act—Malvern C. Burnett ("Burnett")

A. Compensatory Damages

Please enter the amount of compensatory damages you award (if any) for Burnett's violation of the Trafficking Victims Protection Act:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*If in **Section A** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 8**.*

B. Punitive Damages

1. Do you find from a preponderance of the evidence that Burnett acted with malice or reckless indifference when he subjected any Plaintiff to forced labor?

Sony Sulekha	YES	_____	NO	_____
Jacob Joseph Kadakkarappally	YES	_____	NO	_____
Palanyandi Thangamani	YES	_____	NO	_____
Andrews Padavettiyil	YES	_____	NO	_____
Hemant Khuttan	YES	_____	NO	_____

2. Do you find from a preponderance of the evidence that Burnett acted with malice or reckless indifference when he trafficked any Plaintiff for forced labor?

Sony Sulekha YES _____ NO _____

Jacob Joseph Kadakkarappally YES _____ NO _____

Palanyandi Thangamani YES _____ NO _____

Andrews Padavettiyil YES _____ NO _____

Hemant Khuttan YES _____ NO _____

If you answered "Yes" to Questions 1 and/or 2 above for any Plaintiff(s), please enter the amount of punitive damages below for that Plaintiff(s). If you have answered "No" to both questions for any Plaintiff(s), do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on page 8.

Sony Sulekha \$ _____

Jacob Joseph Kadakkarappally \$ _____

Palanyandi Thangamani \$ _____

Andrews Isaac Padavettiyil \$ _____

Hemant Khuttan \$ _____

Please proceed to the next Defendant on page 8.

**Trafficking Victims Protection Act—Law Offices of Malvern C. Burnett, APC
("Burnett Law Offices")**

A. Compensatory Damages

Please enter the amount of compensatory damages you award (if any) for Burnett Law Offices's violation of the Trafficking Victims Protection Act:

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>40,000</u>
Palanyandi Thangamani	\$	<u>30,000</u>
Andrews Isaac Padavettiyil	\$	<u>40,000</u>
Hemant Khuttan	\$	<u>20,000</u>

If in Section A you filled out a dollar amount greater than zero for any Plaintiff(s), please proceed to Section B for that Plaintiff(s). If you did not, please do not proceed to Section B for that Plaintiff(s), and proceed to the next Defendant on page 10.

B. Punitive Damages

1. Do you find from a preponderance of the evidence that Burnett Law Offices acted with malice or reckless indifference when it subjected any Plaintiff to forced labor?

Sony Sulekha	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Jacob Joseph Kadakkarappally	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Palanyandi Thangamani	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Andrews Padavettiyil	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Hemant Khuttan	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

2. Do you find from a preponderance of the evidence that Burnett Law Offices acted with malice or reckless indifference when it trafficked any Plaintiff for forced labor?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

If you answered "Yes" to Questions 1 and/or 2 above for any Plaintiff(s), please enter the amount of punitive damages below for that Plaintiff(s). If you have answered "No" to both questions for any Plaintiff(s), do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on page 10.

Sony Sulekha \$ 100,000

Jacob Joseph Kadakkarappally \$ 100,000

Palanyandi Thangamani \$ 100,000

Andrews Isaac Padavettiyil \$ 100,000

Hemant Khuttan \$ 100,000

Please proceed to the next Defendant on page 10.

Trafficking Victims Protection Act – Sachin Dewan ("Dewan")

A. Compensatory Damages

Please enter the amount of compensatory damages you award (if any) for Dewan's violation of the Trafficking Victims Protection Act:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*If in **Section A** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 12**.*

B. Punitive Damages

1. Do you find from a preponderance of the evidence that Dewan acted with malice or reckless indifference when he subjected any Plaintiff to forced labor?

Sony Sulekha	YES	<u> </u>	NO	<u> </u>
Jacob Joseph Kadakkarappally	YES	<u> </u>	NO	<u> </u>
Palanyandi Thangamani	YES	<u> </u>	NO	<u> </u>
Andrews Padavettiyil	YES	<u> </u>	NO	<u> </u>
Hemant Khuttan	YES	<u> </u>	NO	<u> </u>

2. Do you find from a preponderance of the evidence that Dewan acted with malice or reckless indifference when he trafficked any Plaintiff for forced labor?

Sony Sulekha YES _____ NO _____

Jacob Joseph Kadakkarappally YES _____ NO _____

Palanyandi Thangamani YES _____ NO _____

Andrews Padavettiyil YES _____ NO _____

Hemant Khuttan YES _____ NO _____

If you answered "Yes" to Questions 1 and/or 2 above for any Plaintiff(s), please enter the amount of punitive damages below for that Plaintiff(s). If you have answered "No" to both questions for any Plaintiff(s), do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on page 12.

Sony Sulekha \$ _____

Jacob Joseph Kadakkarappally \$ _____

Palanyandi Thangamani \$ _____

Andrews Isaac Padavettiyil \$ _____

Hemant Khuttan \$ _____

Please proceed to the next Defendant on page 12.

Trafficking Victims Protection Act – Dewan Consultants Pvt. Ltd. (a/k/a Medtech Consultants) (“Dewan Consultants”)

A. Compensatory Damages

Please enter the amount of compensatory damages you award (if any) for Dewan Consultants's violation of the Trafficking Victims Protection Act:

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>40,000</u>
Palanyandi Thangamani	\$	<u>20,000</u>
Andrews Isaac Padavettiyil	\$	<u>40,000</u>
Hemant Khuttan	\$	<u>20,000</u>

If in Section A you filled out a dollar amount greater than zero for any Plaintiff(s), please proceed to Section B for that Plaintiff(s). If you did not, please do not proceed to Section B for that Plaintiff(s), and proceed to CLAIM TWO on page 14.

B. Punitive Damages

1. Do you find from a preponderance of the evidence that Dewan Consultants acted with malice or reckless indifference when it subjected any Plaintiff to forced labor?

Sony Sulekha	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Jacob Joseph Kadakkarappally	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Palanyandi Thangamani	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Andrews Padavettiyil	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Hemant Khuttan	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>

2. Do you find from a preponderance of the evidence that Dewan Consultants acted with malice or reckless indifference when it trafficked any Plaintiff for forced labor?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

If you answered "Yes" to Questions 1 and/or 2 above for any Plaintiff(s), please enter the amount of punitive damages below for that Plaintiff(s). If you have answered "No" to both questions for any Plaintiff(s), do not award any punitive damages for that Plaintiff(s), and proceed to CLAIM TWO on page 14.

Sony Sulekha \$ 100,000

Jacob Joseph Kadakkarappally \$ 100,000

Palanyandi Thangamani \$ 100,000

Andrews Isaac Padavettiyil \$ 100,000

Hemant Khuttan \$ 100,000

Please proceed to CLAIM TWO on page 14.

CLAIM TWO: All Plaintiffs

Discriminatory Terms and Conditions of Employment—Signal

A. Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Signal's discriminatory terms and conditions of employment:

Sony Sulekha	\$ TK 25,000 <u>25,275</u>
Jacob Joseph Kadakkarappally	\$ <u>21,385</u>
Palanyandi Thangamani	\$ <u>102,812</u>
Andrews Isaac Padavettiyil	\$ <u>103,475</u>
Hemant Khuttan	\$ <u>91,880</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$ <u>21,600</u>
Jacob Joseph Kadakkarappally	\$ <u>18,200</u>
Palanyandi Thangamani	\$ <u>87,600</u>
Andrews Isaac Padavettiyil	\$ <u>90,000</u>
Hemant Khuttan	\$ <u>80,400</u>

If in Section A.1 you filled out a dollar amount greater than zero for any Plaintiff(s), please proceed to Section B for that Plaintiff(s). If you did not, please do not proceed to Section B for that Plaintiff(s), and proceed to "Harassing Living Conditions" on page 16.

B. Punitive Damages

Do you find from a preponderance of the evidence that Signal acted with malice or reckless indifference when it subjected any Plaintiff to discriminatory terms and conditions of employment?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to "Harassing Living Conditions" on page 16.

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Signal's discriminatory terms and conditions of employment:

Sony Sulekha \$ 200,000

Jacob Joseph Kadakkarappally \$ 200,000

Palanyandi Thangamani \$ 200,000

Andrews Isaac Padavettiyil \$ 200,000

Hemant Khuttan \$ 200,000

Please proceed to "Harassing Living Conditions" on page 16.

Harassing Living Conditions—Signal**A. Compensatory Damages**

1. Please enter the amount of compensatory damages you award (if any) for Signal's harassing living conditions:

Sony Sulekha	\$ <u>25,275</u>
Jacob Joseph Kadakkarappally	\$ <u>21,385</u>
Palanyandi Thangamani	\$ <u>102,812</u>
Andrews Isaac Padavettiyil	\$ <u>103,475</u>
Hemant Khuttan	\$ <u>91,880</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$ <u>21,600</u>
Jacob Joseph Kadakkarappally	\$ <u>18,200</u>
Palanyandi Thangamani	\$ <u>87,600</u>
Andrews Isaac Padavettiyil	\$ <u>90,000</u>
Hemant Khuttan	\$ <u>80,400</u>

*If in **Section A.1** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to **CLAIM THREE** on **page 18**.*

B. Punitive Damages

Do you find from a preponderance of the evidence that Signal acted with malice or reckless indifference when it subjected any Plaintiff to harassing living conditions?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

*If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to **CLAIM THREE** on page 18.*

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Signal's harassing conditions:

Sony Sulekha \$ 200,000

Jacob Joseph Kadakkarappally \$ 200,000

Palanyandi Thangamani \$ 200,000

Andrews Isaac Padavettiyil \$ 200,000

Hemant Khuttan \$ 200,000

*Please proceed to **CLAIM THREE** on page 18.*

CLAIM THREE: Plaintiff Jacob Joseph Kadakkarappally ("Mr. Jacob")

Retaliation—Signal

A. Compensatory Damages

Please enter the amount of compensatory damages you award (if any) for Signal's unlawful retaliation:

Jacob Joseph Kadakkarappally \$ 150,000

If in Section A you filled out a dollar amount greater than zero, please proceed to Section B. If you did not, please do not proceed to Section B, and proceed to CLAIM FOUR on page 19.

B. Punitive Damages

Has Mr. Jacob proven by a preponderance of the evidence that Signal acted with malice or reckless indifference to his right to be free from unlawful retaliation?

YES NO

If you answered "Yes," please enter below the amount of punitive damages. If you answered "No," please do not award any punitive damages, and proceed to CLAIM FOUR on page 19.

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Signal's unlawful retaliation:

Jacob Joseph Kadakkarappally \$ 450,000

CLAIM FOUR: All Plaintiffs

RICO—Signal

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Signal's RICO violation(s):

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>20,000</u>
Palanyandi Thangamani	\$	<u>30,000</u>
Andrews Isaac Padavettiyil	\$	<u>28,000</u>
Hemant Khuttan	\$	<u>31,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

Please proceed to the next Defendant on page 20.

RICO—Malvern C. Burnett ("Burnett")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Burnett's RICO violation(s):

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*Please proceed to the next Defendant on **page 21.***

RICO—Law Offices of Malvern C. Burnett, APC ("Burnett Law Offices")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Burnett Law Offices's RICO violation(s):

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>20,000</u>
Palanyandi Thangamani	\$	<u>20,000</u>
Andrews Isaac Padavettiyil	\$	<u>20,000</u>
Hemant Khuttan	\$	<u>20,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*Please proceed to the next Defendant on **page 22.***

RICO—Sachin Dewan ("Dewan")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Dewan's RICO violation(s):

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*Please proceed to the next Defendant on **page 23.***

RICO—Dewan Consultants Pvt. Ltd. (a/k/a Medtech Consultants) ("Dewan Consultants")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Dewan Consultants's RICO violation(s):

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>20,000</u>
Palanyandi Thangamani	\$	<u>20,000</u>
Andrews Isaac Padavettiyil	\$	<u>20,000</u>
Hemant Khuttan	\$	<u>20,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

Please proceed to CLAIM FIVE on page 24.

CLAIM FIVE: All Plaintiffs

Fraud—Signal

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Signal's fraudulent conduct:

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>20,000</u>
Palanyandi Thangamani	\$	<u>30,000</u>
Andrews Isaac Padavettiyil	\$	<u>28,000</u>
Hemant Khuttan	\$	<u>31,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*Please proceed to the next Defendant on **page 25.***

Fraud—Malvern C. Burnett ("Burnett")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Burnett's fraudulent conduct:

Sony Sulekha	\$ _____ 0 _____
Jacob Joseph Kadakkarappally	\$ _____ 0 _____
Palanyandi Thangamani	\$ _____ 0 _____
Andrews Isaac Padavettiyil	\$ _____ 0 _____
Hemant Khuttan	\$ _____ 0 _____

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$ _____ 0 _____
Jacob Joseph Kadakkarappally	\$ _____ 0 _____
Palanyandi Thangamani	\$ _____ 0 _____
Andrews Isaac Padavettiyil	\$ _____ 0 _____
Hemant Khuttan	\$ _____ 0 _____

*Please proceed to the next Defendant on **page 26.***

Fraud—Law Offices of Malvern C. Burnett, APC ("Burnett Law Offices")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Burnett Law Offices's fraudulent conduct:

Sony Sulekha	\$ <u>20,000</u>
Jacob Joseph Kadakkarappally	\$ <u>20,000</u>
Palanyandi Thangamani	\$ <u>20,000</u>
Andrews Isaac Padavettiyil	\$ <u>20,000</u>
Hemant Khuttan	\$ <u>20,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$ <u>0</u>
Jacob Joseph Kadakkarappally	\$ <u>0</u>
Palanyandi Thangamani	\$ <u>0</u>
Andrews Isaac Padavettiyil	\$ <u>0</u>
Hemant Khuttan	\$ <u>0</u>

Please proceed to the next Defendant on page 27.

Fraud—Sachin Dewan ("Dewan")

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Dewan's fraudulent conduct:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*Please proceed to the next Defendant on **page 28.***

Fraud— Dewan Consultants Pvt. Ltd. (a/k/a Medtech Consultants) (“Dewan Consultants”)

Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Dewan Consultants's fraudulent conduct:

Sony Sulekha	\$	<u>20,000</u>
Jacob Joseph Kadakkarappally	\$	<u>20,000</u>
Palanyandi Thangamani	\$	<u>20,000</u>
Andrews Isaac Padavettiyil	\$	<u>20,000</u>
Hemant Khuttan	\$	<u>20,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice. For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*Please proceed to **CLAIM SEVEN** on page 29.*

CLAIM SEVEN: All Plaintiffs against Signal, Burnett, and Dewan

Breach of Contract or Promissory Estoppel—Signal

A. Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Signal's breach of contract and/or promissory estoppel:

Sony Sulekha	\$	<u>500,000</u>
Jacob Joseph Kadakkarappally	\$	<u>500,000</u>
Palanyandi Thangamani	\$	<u>500,000</u>
Andrews Isaac Padavettiyil	\$	<u>500,000</u>
Hemant Khuttan	\$	<u>500,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>500,000</u>
Jacob Joseph Kadakkarappally	\$	<u>500,000</u>
Palanyandi Thangamani	\$	<u>500,000</u>
Andrews Isaac Padavettiyil	\$	<u>500,000</u>
Hemant Khuttan	\$	<u>500,000</u>

*If in **Section A.1** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 31**.*

B. Punitive Damages

Do you find from a preponderance of the evidence that Signal acted with malice or reckless indifference with respect to the breach of contract and/or promissory estoppel claim?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

*If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on **page 31**.*

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Signal's breach of contract and/or promissory estoppel:

Sony Sulekha \$ 500,000

Jacob Joseph Kadakkarappally \$ 500,000

Palanyandi Thangamani \$ 500,000

Andrews Isaac Padavettiyil \$ 500,000

Hemant Khuttan \$ 500,000

*Please proceed to the next Defendant on **page 31**.*

Breach of Contract or Promissory Estoppel—Malvern C. Burnett ("Burnett")

A. Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Burnett's breach of contract and/or promissory estoppel:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>0</u>
Jacob Joseph Kadakkarappally	\$	<u>0</u>
Palanyandi Thangamani	\$	<u>0</u>
Andrews Isaac Padavettiyil	\$	<u>0</u>
Hemant Khuttan	\$	<u>0</u>

*If in **Section A.1** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 33**.*

B. Punitive Damages

Do you find from a preponderance of the evidence that Burnett acted with malice or reckless indifference with respect to the breach of contract and/or promissory estoppel claim?

Sony Sulekha YES _____ NO _____

Jacob Joseph Kadakkarappally YES _____ NO _____

Palanyandi Thangamani YES _____ NO _____

Andrews Padavettiyil YES _____ NO _____

Hemant Khuttan YES _____ NO _____

*If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on **page 33**.*

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Burnett's breach of contract and/or promissory estoppel:

Sony Sulekha \$ _____

Jacob Joseph Kadakkarappally \$ _____

Palanyandi Thangamani \$ _____

Andrews Isaac Padavettiyil \$ _____

Hemant Khuttan \$ _____

*Please proceed to the next Defendant on **page 33**.*

Breach of Contract or Promissory Estoppel—Law Offices of Malvern C. Burnett, APC ("Burnett Law Offices")

A. Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Burnett Law Offices's breach of contract and/or promissory estoppel:

Sony Sulekha	\$	<u>5,000</u>
Jacob Joseph Kadakkarappally	\$	<u>5,000</u>
Palanyandi Thangamani	\$	<u>5,000</u>
Andrews Isaac Padavettiyil	\$	<u>5,000</u>
Hemant Khuttan	\$	<u>5,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>5,000</u>
Jacob Joseph Kadakkarappally	\$	<u>5,000</u>
Palanyandi Thangamani	\$	<u>5,000</u>
Andrews Isaac Padavettiyil	\$	<u>5,000</u>
Hemant Khuttan	\$	<u>5,000</u>

*If in **Section A.1** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 35**.*

B. Punitive Damages

Do you find from a preponderance of the evidence that Burnett Law Offices acted with malice or reckless indifference with respect to the breach of contract and/or promissory estoppel claim?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on page 35.

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Burnett Law Offices's breach of contract and/or promissory estoppel:

Sony Sulekha \$ 10,000

Jacob Joseph Kadakkarappally \$ 10,000

Palanyandi Thangamani \$ 10,000

Andrews Isaac Padavettiyil \$ 10,000

Hemant Khuttan \$ 10,000

Please proceed to the next Defendant on page 35.

Breach of Contract or Promissory Estoppel—Sachin Dewan ("Dewan")

A. Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Dewan's breach of contract and/or promissory estoppel:

Sony Sulekha	\$ _____ 0 _____
Jacob Joseph Kadakkarappally	\$ _____ 0 _____
Palanyandi Thangamani	\$ _____ 0 _____
Andrews Isaac Padavettiyil	\$ _____ 0 _____
Hemant Khuttan	\$ _____ 0 _____

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$ _____ 0 _____
Jacob Joseph Kadakkarappally	\$ _____ 0 _____
Palanyandi Thangamani	\$ _____ 0 _____
Andrews Isaac Padavettiyil	\$ _____ 0 _____
Hemant Khuttan	\$ _____ 0 _____

*If in **Section A.1** you filled out a dollar amount greater than zero for **any** Plaintiff(s), please proceed to **Section B** for that Plaintiff(s). If you did not, please do not proceed to **Section B** for that Plaintiff(s), and proceed to the next Defendant on **page 37**.*

B. Punitive Damages

Do you find from a preponderance of the evidence that Dewan acted with malice or reckless indifference with respect to the breach of contract and/or promissory estoppel claim?

Sony Sulekha YES _____ NO _____

Jacob Joseph Kadakkarappally YES _____ NO _____

Palanyandi Thangamani YES _____ NO _____

Andrews Padavettiyil YES _____ NO _____

Hemant Khuttan YES _____ NO _____

*If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to the next Defendant on **page 37**.*

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Dewan's breach of contract and/or promissory estoppel:

Sony Sulekha \$ _____

Jacob Joseph Kadakkarappally \$ _____

Palanyandi Thangamani \$ _____

Andrews Isaac Padavettiyil \$ _____

Hemant Khuttan \$ _____

*Please proceed to the next Defendant on **page 37**.*

Breach of Contract or Promissory Estoppel—Dewan Consultants Pvt. Ltd. (a/k/a Medtech Consultants) ("Dewan Consultants")

A. Compensatory Damages

1. Please enter the amount of compensatory damages you award (if any) for Dewan Consultants's breach of contract and/or promissory estoppel:

Sony Sulekha	\$	<u>5,000</u>
Jacob Joseph Kadakkarappally	\$	<u>5,000</u>
Palanyandi Thangamani	\$	<u>5,000</u>
Andrews Isaac Padavettiyil	\$	<u>5,000</u>
Hemant Khuttan	\$	<u>5,000</u>

2. Now consider the amount of compensatory damages awarded above (if any) in light of the compensatory damages awarded for any other claim. You may not award the same damages twice (except for mental anguish). For example, if you have awarded recruitment fees under another claim, you may not award those same fees under this claim.

With these instructions in mind, please indicate below the damages you award for this claim (if any) that are not duplicative of damages awarded under any other claim:

Sony Sulekha	\$	<u>5,000</u>
Jacob Joseph Kadakkarappally	\$	<u>5,000</u>
Palanyandi Thangamani	\$	<u>5,000</u>
Andrews Isaac Padavettiyil	\$	<u>5,000</u>
Hemant Khuttan	\$	<u>5,000</u>

If in Section A.1 you filled out a dollar amount greater than zero for any Plaintiff(s), please proceed to Section B for that Plaintiff(s). If you did not, please do not proceed to Section B for that Plaintiff(s), and proceed to CLAIM EIGHT on page 39.

B. Punitive Damages

Do you find from a preponderance of the evidence that Dewan Consultants acted with malice or reckless indifference with respect to the breach of contract and/or promissory estoppel claim?

Sony Sulekha YES NO

Jacob Joseph Kadakkarappally YES NO

Palanyandi Thangamani YES NO

Andrews Padavettiyil YES NO

Hemant Khuttan YES NO

*If you answered "Yes" for any Plaintiff(s), please enter below the amount of punitive damages for that Plaintiff(s). If you answered "No," for any Plaintiff(s), please do not award any punitive damages for that Plaintiff(s), and proceed to **CLAIM EIGHT** on page 39.*

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Dewan Consultant's breach of contract and/or promissory estoppel:

Sony Sulekha \$ 10,000

Jacob Joseph Kadakkarappally \$ 10,000

Palanyandi Thangamani \$ 10,000

Andrews Isaac Padavettiyil \$ 10,000

Hemant Khuttan \$ 10,000

*Please proceed to **CLAIM EIGHT** on page 39.*

CLAIM EIGHT: Plaintiff Jacob Joseph Kadakkarappally ("Mr. Jacob") against Signal

False Imprisonment

Please enter the amount of compensatory damages you award (if any) for Signal's false imprisonment of Mr. Jacob:

Jacob Joseph Kadakkarappally \$ 150,000

If in Section A you filled out a dollar amount greater than zero, please proceed to Section B. If you did not, please do not proceed to Section B, and proceed to CLAIM NINE on page 40.

B. Punitive Damages

Has Mr. Jacob proven by a preponderance of the evidence that Signal acted with malice or reckless indifference to his right to be free from false imprisonment?

YES NO

If you answered "Yes," please enter below the amount of punitive damages. If you answered "No," please do not award any punitive damages, and proceed to CLAIM NINE on page 40.

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Signal's false imprisonment:

Jacob Joseph Kadakkarappally \$ 450,000

Please proceed to CLAIM NINE on page 40.

CLAIM NINE: Plaintiff Jacob Joseph Kadakkarappally ("Mr. Jacob") against Signal

Intentional Infliction of Emotional Distress

Please enter the amount of compensatory damages you award (if any) for Signal's intentional infliction of emotional distress on Mr. Jacob:

Jacob Joseph Kadakkarappally \$ 150,000

If in Section A you filled out a dollar amount greater than zero, please proceed to Section B. If you did not, please do not proceed to Section B, and please sign and date this Stage 2 Jury Verdict Form.

B. Punitive Damages

Has Mr. Jacob proven by a preponderance of the evidence that Signal acted with malice or reckless indifference to his right to be free from intentional infliction of emotional distress?

YES NO

If you answered "Yes," please enter below the amount of punitive damages. If you answered "No," please do not award any punitive damages, and please sign and date this Stage 2 Jury Verdict Form.

In the event you award punitive damages under a different claim (such as the Forced Labor Claim), please indicate below only the punitive damages you are awarding as a result of Signal's intentional infliction of emotional distress:

Jacob Joseph Kadakkarappally \$ 450,000

Please sign and date this Stage 2 Jury Verdict Form.

New Orleans, Louisiana this 18th day of February, 2015.


Jury Foreperson