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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

PRISON LEGAL NEWS, a project of the
HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

v.

COLUMBIA COUNTY; COLUMBIA
COUNTY SHERIFF'S OFFICE; JEFF
DICKERSON, individually and in his capacity
as Columbia County Sheriff,

Defendants.

No. 3:12-CV-71-SI

PLAINTIFF'S PROPOSED SPECIAL
VERDICT FORM

Plaintiff Prison Legal News respectfully submits the following proposed special verdict form:

1. On Prison Legal News's claim that Defendants censored sixty-five (65) of PLN's mailings in violation of the First Amendment of the United States Constitution, what amount of damages will fairly compensate Prison Legal News for this violation?

Answer: Economic Damages \$ _____.

Presumed Damages \$ _____.

2. On Prison Legal News's claim that Defendants censored sixty-five (65) pieces of mail without providing due process in violation of the Fourteenth Amendment of the United States Constitution, award nominal damages in the amount of \$1.00 per violation.

Answer: Nominal Damages \$ _____.

3. Do you find that Prison Legal News should be awarded punitive damages against Defendant Sheriff Dickerson for violation of the First Amendment to the United States Constitution?

Answer: Yes _____ No _____

If yes, what do you find to be the amount of punitive damages?

Answer: \$ _____.

4. Do you find that Prison Legal News should be awarded punitive damages against Defendant Sheriff Dickerson for violation of the Fourteenth Amendment to the United States Constitution?

Answer: Yes _____ No _____

If yes, what amount of punitive damages do you award?

Answer: \$ _____.

DATED: _____, 2013.

Presiding Juror

DATED this 31st day of December, 2012.

MACDONALD HOAGUE & BAYLESS

/s/ Jesse Wing

JESSE WING, admitted *pro hac vice*

KATHERINE C. CHAMBERLAIN

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Of Attorneys for Plaintiff Prison Legal News

CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2012, I electronically filed the foregoing to the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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