

FINAL

Revised

VERDICT FORM NO. 1

(VF-2500. Disparate Treatment (Gov. Code, § 12940(a)))

20-2024-01394359
Byer v. City of La Palma

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

DEC 09 2025

DAVID H. YAMASAKI, Clerk of the Court
BY _____ DEPUTY

We answer the questions submitted to us as follows:

1. Did the City of La Palma subject Ross Byer to an adverse employment action or constructively discharge him?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this verdict form, have the presiding juror sign and date this form, and proceed to Verdict Form No. 2.

2. Was Ross Byer's race, ethnicity, or national origin a substantial motivating reason for the City of La Palma's adverse action or decision to constructively discharge him?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions on this verdict form, have the presiding juror sign and date this form, and proceed to Verdict Form No. 2.

3. Was Ross Byer's job performance also a substantial motivating reason for the constructive discharge or other adverse employment action?

☐ Yes ☒ No

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

4. Would the City of La Palma have constructively discharged or taken other adverse employment action against Ross Byer anyway at that time based on Ross Byer's poor job performance had the City of La Palma not also been substantially motivated by discrimination and/or retaliation?

☐ Yes ☐ No

If your answer to question 4 is no, then answer question 5. If you answered yes, stop here, answer no further questions on this verdict form, and have the presiding juror sign and date this form.

5. Was the City of La Palma's adverse action or constructive discharge a substantial factor in causing harm to Ross Byer?

☒ Yes ☐ No

If your answer to question 5 is yes, then proceed to Verdict Form Number 4, indicate you find in favor of Ross Byer and against the City of La Palma as to Discrimination, and enter any award of damages. Then, proceed to Verdict Form Number 2.

If you answered no, stop here, answer no further questions on this verdict form, have the presiding juror sign and date this form, and proceed to Verdict Form No. 2.

Signed: [Signature]
Presiding Juror

Dated: 12/9/2025

VERDICT FORM NO. 2
(VF-2504. Retaliation (Gov. Code, § 12940(h)))

We answer the questions submitted to us as follows:

1. Did Ross Byer report discrimination or retaliation after he reported discrimination?

X Yes No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions on this verdict form, and have the presiding juror sign and date this form.

2. Did the City of La Palma subject Ross Byer to an adverse employment action or constructively discharge Ross Byer?

OR

Did City of La Palma engage in conduct that, taken as a whole, materially and adversely affected the terms and conditions of Ross Byer's employment?

X Yes No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions on this verdict form, and have the presiding juror sign and date this form.

3. Was Ross Byer's reporting of discrimination or retaliation a substantial motivating reason for the City of La Palma's decision to constructively discharge Ross Byer or decision to subject Ross Byer to an adverse employment action?

X Yes No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions on this verdict form, and have the presiding juror sign and date this form.

4. Was Ross Byer's job performance also a substantial motivating reason for the constructive discharge or other adverse employment action?

 Yes X No

If your answer to question 4 is yes, then answer question 5. If you answered no, skip question 5 and answer question 6.

5. Would the City of La Palma have constructively discharged or taken other adverse employment action against Ross Byer anyway at that time based on Ross Byer's poor job performance had the City of La Palma not also been substantially motivated by discrimination and/or retaliation?

 Yes No

If your answer to question 5 is no, then answer question 6. If you answered yes, stop here, answer no further questions on this verdict form, and have the presiding juror sign and date this form.

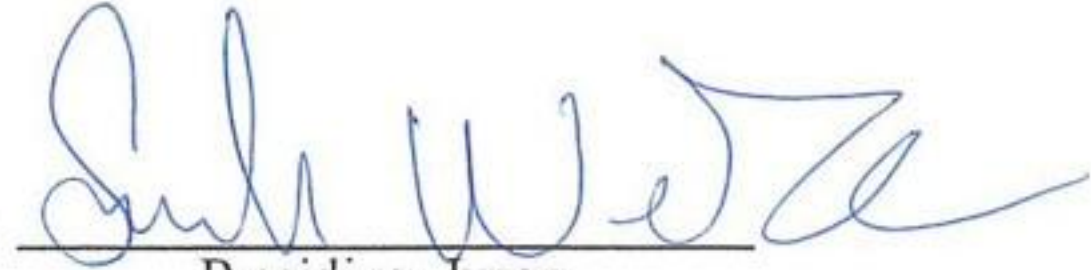
6. Was the City of La Palma's conduct a substantial factor in causing harm to Ross Byer?

X Yes No

If your answer to question 6 is yes, then proceed to Verdict Form Number 4, indicate you find in favor of Ross Byer and against the City of La Palma as to Retaliation, and enter any award of damages. Then, proceed to Verdict Form Number 3.

If you answered no and also found in favor of Defendant on Verdict Form Number 1, stop here, answer no further questions, and have the presiding juror sign and date this form.

If you answered no, but found in favor of Plaintiff on Verdict Form Number 1, proceed to Verdict Form Number 3.

Signed: 
Presiding Juror

Dated: 12/9/2025

VERDICT FORM NO. 3

(VF-2514. Failure to Prevent Discrimination and/or Retaliation)

We answer the questions submitted to us as follows:

1. Did the City of La Palma fail to take all reasonable steps to prevent the discrimination and/or retaliation?

X Yes No

If your answer to question 1 is **yes**, then answer question 2. If you answered **no**, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Was the City of La Palma's failure to prevent the discrimination and/or retaliation a substantial factor in causing harm to Ross Byer?

X Yes No

If your answer to question 2 is **yes**, then proceed to Verdict Form Number 4, indicate you find in favor of Ross Byer and against the City of La Palma as to Failure to Prevent Discrimination and/or Retaliation, and enter any award of damages. If you answered **no**, stop here, answer no further questions, and have the presiding juror sign and date this form.

Signed: Sule W. [Signature]
Presiding Juror

Dated: 12/9/2025

VERDICT FORM NO. 4

(VF-5001. GENERAL VERDICT FORM – SINGLE PLAINTIFF – SINGLE DEFENDANT – MULTIPLE CAUSES OF ACTION)

For each claim, select one of the two options listed.

On Ross Byer's claim for Discrimination (Verdict Form Number 1)

X we find in favor of Ross Byer and against the City of La Palma.

 we find in favor of City of La Palma and against Ross Byer.

On Ross Byer's claim for Retaliation (Verdict Form Number 2)

X we find in favor of Ross Byer and against City of La Palma.

 we find in favor of City of La Palma and against Ross Byer.

On Ross Byer's claim for Failure to Prevent Discrimination and/or Retaliation (Verdict Form Number 3)

X we find in favor of Ross Byer and against City of La Palma.

 we find in favor of City of La Palma and against Ross Byer.

Complete the section below **only** if you find in favor of Ross Byer on his claim for Discrimination (Verdict Form Number 1), Retaliation (Verdict Form Number 2), or both.

We award Ross Byer the following damages:

a. Past noneconomic loss, including mental suffering, loss of enjoyment of life, inconvenience, grief, anxiety, humiliation, and emotional distress:

Total Past Noneconomic loss Damages: \$ 3924

b. Future Noneconomic loss, including mental suffering, loss of enjoyment of life, inconvenience, grief, anxiety, humiliation, and emotional distress:

Total Future Noneconomic loss Damages: \$ 4.48M

TOTAL \$ 8,400,000.00

Signed: John W. Lee

Presiding Juror

Dated: 12/09/2025

After all verdict forms have been signed, notify the court attendant