

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
FIRST JUDICIAL DISTRICT AT JUNEAU

JOAN WILKERSON,

Plaintiff,

vs.

Case No. 1JU-18-01072 CI

STATE OF ALASKA, DEPARTMENT  
OF LAW,

Defendant.

**VERDICT FORM**

We, the jury in the above-entitled case, find the following on the questions submitted to us.

**1. FIRST CAUSE OF ACTION - WRONGFUL DISCHARGE IN  
RETALIATION FOR REPORTING VIOLATIONS OF PUBLIC POLICY**

Has Plaintiff proven, by a preponderance of the evidence, that Defendant violated public policy when it terminated Plaintiff's employment?

Yes:   X  

No: \_\_\_\_\_

**2. SECOND CAUSE OF ACTION - WRONGFUL DISCHARGE IN  
VIOLATION OF THE IMPLIED COVENANT OF GOOD FAITH AND  
FAIR DEALING**

Has Plaintiff proven, by a preponderance of the evidence, that Defendant violated the implied covenant of good faith and fair dealing?

Yes:   X  

No: \_\_\_\_\_

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**3. THIRD CAUSE OF ACTION - BREACH OF CONTRACT**

Has Plaintiff proven, by a preponderance of the evidence, that Defendant engaged in a breach of contract?

Yes:       X       No: \_\_\_\_\_

**4. FOURTH CAUSE OF ACTION - VIOLATION OF CLASSIFICATION SYSTEM**

Has Plaintiff proven, by a preponderance of the evidence, that Defendant violated the personnel classification system?

Yes:       X       No: \_\_\_\_\_

**5. DAMAGES**

If you answered "Yes" to any of Questions 1-4, you must determine the total damages, if any, to Plaintiff that were caused by Defendant by answering the question: What damages do you award the plaintiff?

If you answered "No" to all of Questions 1-4, skip this section.

(a) If you answered "Yes" to Questions 1, 2, and / or 3, you must answer the question: What economic damages are owed to Plaintiff Joan Wilkerson by Defendant State of Alaska Department of Law for the period between her termination on September 20, 2018, until her expected retirement date on April 30, 2022?

\$ 742,685

(b) Only if you answered "Yes" to Question No. 1, you must answer the question: What non-economic damages is Plaintiff entitled to from Defendant due to Plaintiff's termination in retaliation for reporting violations of public policy?

\$ 145,000

(c) If you answered "Yes" to Question 4, you must answer the question: what back pay and benefits are owed Plaintiff by Defendant for the period from June 1, 2015, to September 21, 2018?

\$ 579,790<sup>06</sup>

(d) If you answered "Yes" to Question 4, you must answer the question: what additional pay and benefits are owed Plaintiff by Defendant for the period from September 21, 2018, through her probable life expectancy?

\$ 231,035<sup>59</sup>

TOTAL (add answers to Questions 5(a) to 5(d)):

\$ 1,176,699.65

DATED at ~~Anchorage~~ Juneau, Alaska this 6<sup>th</sup> day of October, 2022.

By: 

Jury Foreperson