



15-2-05962-4 48594122 JDV 01-24-17



SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR PIERCE COUNTY

MICHAEL QUAYLE,

Plaintiff,

v.

STATE OF WASHINGTON; DEPARTMENT OF
SOCIAL AND HEALTH SERVICES; and
WESTERN STATE HOSPITAL,

Defendants.

NO. 15-2-05962-4

JUDGMENT

ASSIGNED TO:
HONORABLE STANLEY J. RUMBAUGH

I. JUDGMENT SUMMARY

- 1. Judgment Creditor: Michael Quayle
- 2. Judgment Debtors: State of Washington, Department of Social and Health Services; and Western State Hospital
- 3. Principal Judgment Amount: \$548,030.00
- 4. Award for Adverse Tax Consequences: \$28,429.00
- 5. Attorney Fees: \$492,987.50
- 6. Litigation Expenses: \$36,647.94
- 7. The total Judgment shall bear interest as set forth by RCW 4.56.110(3), which is calculated at 2.544 percent. Attorneys' fees, costs and any other recoverable amount shall bear interest as set forth by RCW 4.56.110(3), which is calculated at 2.544 percent.

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8. Attorneys for Judgment Creditor:

James W. Beck
Janelle E. Chase-Fazio
Gordon Thomas Honeywell LLP
1201 Pacific Ave., Suite 2100
P.O. Box 1157
Tacoma, WA 98401-1157

II. ORDER

This matter having come on regularly before the above-entitled Court for trial and having reached a jury verdict on December 23, 2016, a copy of which is attached, and the Court having found that there is no just reason for delay in entering judgment, and the Court having reviewed the records and files herein, and being fully advised in the premises, it is now, therefore

ORDERED, ADJUDGED AND DECREED that Plaintiff Michael Quayle is hereby granted judgment against Defendants in the total amount of \$1,106,094.44. The attorney's fees and costs listed above include all claims for reasonable attorney's fees and costs through January 18, 2017. Should there be a right to additional attorney's fees of costs for actions taken after January 18, 2017, then counsel may move the Court as appropriate.

DONE IN OPEN COURT this 20th day of January, 2017.



HONORABLE STANLEY J. RUMBAUGH

Presented by:

GORDON THOMAS HONEYWELL LLP


By: 

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Attorneys for Plaintiff

FILED
DEPT. 18
IN OPEN COURT


JAN 20 2017

Pierce County Clerk

By:  DEPUTY

1 APPROVED:

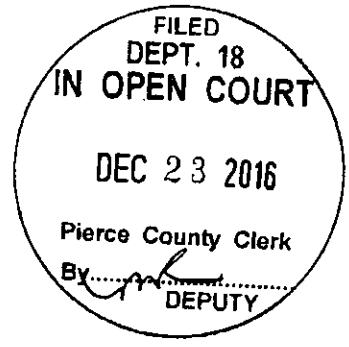
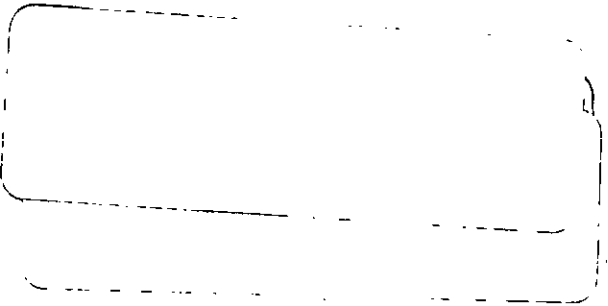
2 ROBERT W. FERGUSON
3 Attorney General

4 By:  _____

5 Peter J. Helmberger
6 WSBA No. 23041, OID No. 91105
7 Matthew T. Kuehn
8 WSBA No. 30419, OID No. 91105
9 Assistant Attorneys General
10 Attorneys for Defendants
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SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR PIERCE COUNTY

MICHAEL QUAYLE,

Plaintiff,

v.

STATE OF WASHINGTON; DEPARTMENT
OF SOCIAL AND HEALTH SERVICES; and
WESTERN STATE HOSPITAL,

Defendants.

NO. 15-2-05962-4

SPECIAL VERDICT FORM

ASSIGNED TO:
HONORABLE STANLEY J. RUMBAUGH

We, the jury, answer the questions submitted by the Court as follows:

QUESTION 1: Did the defendant retaliate against the plaintiff for reporting patient abuse or neglect?

ANSWER: YES (Write "yes" or "no")

QUESTION 2: Did the defendant retaliate against the plaintiff for opposing sexual orientation discrimination or retaliation, or participating in a proceeding to determine if discrimination or retaliation occurred?

ANSWER: NO (Write "yes" or "no")

(INSTRUCTION: If you answered "yes" to Question 1 or Question 2, proceed to Question 3. If you answered "no" to Question 1 and Question 2, then sign and return this verdict form.)

QUESTION 3: Was the plaintiff's reporting of patient abuse or neglect or opposing sexual orientation discrimination or participating in a proceeding to determine if discrimination or retaliation occurred a proximate cause of his termination or an adverse employment action?

ANSWER: YES (Write "yes" or "no")

(INSTRUCTION: If you answered "yes" to Question 3, proceed to Question 4. If you answered "no" to Question 3, then sign and return this verdict form.)

QUESTION 4: What do you find to be the total amount of plaintiff's damages?

ANSWER:	Past Economic Damages	\$ <u>91,200.</u>
	Future Economic Damages	\$ <u>128,843.</u>
	Past and Future Non-Economic Damages	\$ <u>327,987.</u>
	TOTAL:	\$ <u>548,030</u>

Sign and return this verdict form.

DATE: Dec 23rd, 2016

Jamara A. Ansett
PRESIDING JUROR

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