

**IN THE COURT OF COMMON PLEAS  
LORAIN COUNTY, OHIO  
CIVIL DIVISION**

**GIBSON BROS, INC., *et al.*,**

Plaintiffs,

vs.

**OBERLIN COLLEGE aka OBERLIN  
COLLEGE AND CONSERVATORY,  
*et al.*,**

Defendants.

CASE NO. 17CV193761

JUDGE JOHN R. MIRALDI

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**JURY INTERROGATORY #1 – ALLYN W. GIBSON LIBEL CLAIM AGAINST  
OBERLIN COLLEGE**

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A. Did Allyn W. Gibson prove by a preponderance of the evidence that Oberlin College libeled him?

Please circle one:      YES                      or                      NO


If six (6) or more jurors answered “NO” to part (A), skip parts (B) and (C) and sign the general verdict form that follows this Interrogatory for Oberlin College.

If six (6) or more jurors answered “YES” to part (A), only those jurors shall participate in part (B) below. In order to have found Oberlin College libeled Allyn W. Gibson, you must answer “YES” to EITHER part (B) or part (C) but not both.

B. Did Allyn W. Gibson prove by clear and convincing evidence that Oberlin College acted with actual malice in libeling him?

Please circle one:      YES                      or                      NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “NO” to part (B), proceed to part (C).

If six (6) or more jurors answered “YES” to part (B) – skip part (C) and sign the general verdict form that follows this Interrogatory for Allyn W. Gibson.

C. Did Allyn W. Gibson prove by clear and convincing evidence that Oberlin College acted with negligence in libeling him?

Please circle one:      YES                      or                      NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “YES” to part (C) sign the general verdict form that follows this Interrogatory for Allyn W. Gibson.

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**GENERAL VERDICT – LIBEL CLAIM OF PLAINTIFF ALLYN W. GIBSON  
AGAINST DEFENDANT OBERLIN COLLEGE**

---

A. We, the jury, do hereby find for the Plaintiff Allyn W. Gibson, and against Oberlin College, on Allyn W. Gibson’s libel claim.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Oberlin College and against Allyn W. Gibson on Allyn W. Gibson’s libel claim against Oberlin College

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory.

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**JURY INTERROGATORY #2– ALLYN W. GIBSON’S LIBEL CLAIM AGAINST  
MEREDITH RAIMONDO**

---

A. Did Allyn W. Gibson prove by a preponderance of the evidence that Meredith Raimondo libeled him?

Please circle one:    YES                      or                      NO


If six (6) or more jurors answered “NO” to part (A), skip parts (B) and (C) and sign the general verdict form that follows this Interrogatory for Meredith Raimondo.

If six (6) or more jurors answered “YES” to part (A), only those jurors shall participate in part (B) below. In order to have found Meredith Raimondo libeled Allyn W. Gibson, you must answer “YES” to EITHER part (B) or part (C) but not both.

B. Did Allyn W. Gibson prove by clear and convincing evidence that Meredith Raimondo acted with actual malice in libeling him?

Please circle one:      YES                      or                      NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “NO” to part (B), proceed to part (C).

If six (6) or more jurors answered “YES” to part (B), skip part (C) and then sign the general verdict form that follows this Interrogatory for Allyn W. Gibson.

C. Did Allyn W. Gibson prove by clear and convincing evidence that Meredith Raimondo acted with negligence in libeling him?

Please circle one:      YES                      or                      NO

_____	_____
_____	_____
_____	_____
_____	_____

If six (6) or more jurors answered “YES” to part (C), sign the general verdict form that follows this Interrogatory for Allyn W. Gibson.

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---

**GENERAL VERDICT – LIBEL CLAIM OF PLAINTIFF ALLYN W. GIBSON  
AGAINST DEFENDANT MEREDITH RAIMONDO**

---

A. We, the jury, do hereby find for the Plaintiff Allyn W. Gibson, and against Meredith Raimondo, on Allyn W. Gibson’s libel claim.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Meredith Raimondo and against Allyn W. Gibson on Allyn W. Gibson’s libel claim.

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory.

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**JURY INTERROGATORY #3  
ALLYN W. GIBSON’S INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
CLAIM AGAINST OBERLIN COLLEGE**

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A. Did Allyn W. Gibson prove by a preponderance of the evidence that Oberlin College intentionally caused him serious emotional distress?

Please circle one:    YES                    or                    NO


If six (6) or more of the jurors have answered “NO” to Interrogatory (A), sign the general verdict that follows this Interrogatory for Oberlin College.

If six (6) or more jurors answered “YES” to part (A), those jurors shall participate in part (B) below.

B. Was Oberlin College's intentional infliction of emotional distress a direct and proximate cause of any damages to Allyn W. Gibson?

Please circle one:      YES                      or                      NO

_____	_____
_____	_____
_____	_____
_____	_____

If the jurors that answered "YES" to part (A) have answered "NO" to part (B), sign the general verdict that follows this Interrogatory for Oberlin College.

If the jurors that answered "YES" to part (A) have answered "YES" to part (B), sign the general verdict that follows this Interrogatory for Allyn W. Gibson.



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---

**GENERAL VERDICT –ALLYN W. GIBSON’S INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS CLAIM AGAINST OBERLIN COLLEGE**

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A. We, the jury, do hereby find for the Plaintiff Allyn W. Gibson, on his claim for intentional infliction of emotional distress against Oberlin College.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Oberlin College on Allyn W. Gibson’s claim for intentional infliction of emotional distress.

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory.

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**JURY INTERROGATORY #4  
ALLYN W. GIBSON’S INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
CLAIM AGAINST MEREDITH RAIMONDO**

---

A. Did Allyn W. Gibson prove by a preponderance of the evidence that Meredith Raimondo intentionally caused him serious emotional distress?

Please circle one:    YES                    or                    NO


If six (6) or more of the jurors have answered “NO” to Interrogatory (A), skip part (B) and sign the general verdict for Meredith Raimondo.

If six (6) or more jurors answered “YES” to part (A), those jurors shall participate in part (B) below.

B. Was Meredith Raimondo's intentional infliction of emotional distress a direct and proximate cause of damages to Allyn W. Gibson?

Please circle one:      YES                      or                      NO

_____	_____
_____	_____
_____	_____
_____	_____

If the jurors that answered "YES" to part (A) have answered "NO" to part (B), sign the general verdict that follows this Interrogatory for Meredith Raimondo.

If the jurors that answered "YES" to part (A) have answered "YES" to part (B), sign the general verdict that follows this Interrogatory for Allyn W. Gibson.

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---

**GENERAL VERDICT –ALLYN W. GIBSON’S INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS CLAIM AGAINST MEREDITH RAIMONDO**

---

A. We, the jury, do hereby find for the Plaintiff Allyn W. Gibson, on his claim for intentional infliction of emotional distress against Meredith Raimondo.

_____	_____
_____	_____
_____	_____
_____	_____

B. We, the jury, do hereby find for the Defendant Meredith Raimondo on Allyn W. Gibson’s claim for intentional infliction of emotional distress.

_____	_____
_____	_____
_____	_____
_____	_____

Please proceed to the next Interrogatory.

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**COMPENSATORY DAMAGES FOR ALLYN W. GIBSON**

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Please specify the amount of damages, past and future, you are awarding to Plaintiff Allyn W. Gibson:

Total Compensatory Damages: \$ \_\_\_\_\_.

Amount of total compensatory damages that represents past economic loss:

\$ \_\_\_\_\_

Amount of the total compensatory damages that represents past non-economic loss:

\$ \_\_\_\_\_

Amount of the total compensatory damages that represents future economic loss:

\$ \_\_\_\_\_

Amount of the total compensatory damages that represents future non-economic loss:

\$ \_\_\_\_\_

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